

1 UNITED STATES DISTRICT COURT
2 MIDDLE DISTRICT OF FLORIDA
3

4 NANCY McLEAN and JOHN McLEAN,)
her son,)

5)
6 Plaintiffs,)

7 vs.)

No. 81-174-Civ. T-K

8 THE CHURCH OF SCIENTOLOGY)
OF CALIFORNIA, et al.,)

9 Defendants.)
10

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12
13 VOLUME I

14 DEPOSITION OF GERALD ARMSTRONG, taken
15 on behalf of Defendant THE CHURCH OF SCIENTOLOGY
16 OF CALIFORNIA at 1722 North Broadway, Santa Ana,
17 California, at 10:00 A.M., Tuesday, February 8,
18 1983, before RUTH PERSKY, CSR #5673, a Notary
19 Public in and for the County of Los Angeles,
20 State of California, pursuant to Subpoena re
21 Deposition.
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25
26

27 Reported By: RUTH PERSKY, CSR #5673

28 Deposition No.: 83-059

1 APPEARANCES :

2 For Plaintiffs:

3 WALT LOGAN
4 6641 Central Avenue
 St. Petersburg, Florida 33710

5 -and-

6 TONY CUNNINGHAM
7 708 Jackson Street
 Tampa, Florida 33602
 (Did Not Appear)

8 For Defendant THE CHURCH OF SCIENTOLOGY
9 OF CALIFORNIA:

10 JOHNSON, PANIELLO & HAYES
11 BY: PAUL B. JOHNSON
 P.O. Box 3416
 Tampa, Florida 33601

12 -and-

13 LAWRENCE E. FUENTES
14 P.O. Box 8532
 Tampa, Florida 33674
 (Did Not Appear)

15 For Defendant MARY SUE HUBBARD:

16 LAW OFFICES OF BARRETT S. LITT
17 BY: MICHAEL S. MAGNUSON
18 617 South Olive Street, Suite 1000
 Los Angeles, California 90014

19 For Defendants L. RON HUBBARD and MARY SUE HUBBARD:

20 ALAN GOLDFARB
21 28 West Flagler Street
22 Roberts Building, 12th Floor
 Miami, Florida 33131
 (Did Not Appear)

23 For Defendant MICHAEL WOLFE:

24 MICHAEL KINNEY
25 201 Bayshore Building
26 2907 Bay-to-Bay Boulevard
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 (Did Not Appear)

27

28

1 APPEARANCES: (Continued)

2 For Defendants JOE LISA and MERRILL VANNIER:

3 CARL E. KOHLWECK
4 1821 Wilshire Boulevard
5 Suite 210
6 Santa Monica, California 90403
7 (Did Not Appear)

8 -and-

9 BENNIE LAZZARA, JR.
10 610 West DeLeon Street
11 Tampa, Florida 33606
12 (Did Not Appear)

13 ALSO PRESENT:

14 KEN LONG
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1 SANTA ANA, CALIFORNIA, TUESDAY, FEBRUARY 8, 1983

2 10:00 A.M.

3
4 GERALD ARMSTRONG

5 called as a witness on behalf of Defendant THE CHURCH OF
6 SCIENTOLOGY OF CALIFORNIA, having been first duly sworn, was
7 examined and testified as follows:

8
9 EXAMINATION

10 BY MR. JOHNSON:

11 Q Will you state your name and address.

12 A Gerry Armstrong.

13 Q Is that Gerry or Gerald?

14 A Gerald.

15 Q The reason I ask is I see the affidavit of
16 witness filed, signed by you, in the case of Nancy McLean and
17 John McLean vs. The Church of Scientology, you signed as
18 Gerry, and I wasn't certain.

19 A You can call me either.

20 Q And your address, please, sir.

21 A 1991 Newport Boulevard.

22 Q What city?

23 A Costa Mesa.

24 Q What county is that in?

25 A Orange.

26 Q Mr. Armstrong, my name is Paul Johnson. I
27 represent the Church of Scientology of California in this
28 case, and I will be initially questioning you.

1 Could we have an understanding that if you don't
2 understand anything I say, you will stop me and ask me to
3 repeat it, because I want to make sure my questions are clear
4 to you so your answers will be responsive. Can we have that
5 agreement?

6 A. Yes.

7 Q What is your occupation, Mr. Armstrong?

8 A. Legal assistant.

9 Q To whom?

10 A. Feldsott, Lee & Van Gemert. Do you want me to
11 spell it?

12 Q Would you, please.

13 A. F-e-l-d-s-o-t-t, L-e-e, and Van Gemert, two
14 words, V-a-n, G-e-m-e-r-t.

15 Q And where is their office located?

16 A. Newport Beach.

17 Q How long have you held that position?

18 A. Since March, last year.

19 Q Of 1982?

20 A. Yes.

21 Q What training or experience did you have to
22 qualify you for that job?

23 A. I'm enrolled in a legal assistant program.

24 Q Where?

25 A. Coastline Community College.

26 Q And that's in the Los Angeles area?

27 A. Orange County area.

28 Q Prior to your becoming a legal assistant to this

1 law firm in March of 1982, what was your occupation?

2 A. I worked for Ralston-Pilot Publishers.

3 Q. What period of time did you work for Ralston-
4 Pilot Publishers?

5 A. Oh, January through March.

6 Q. Of 1982?

7 A. Yes.

8 Q. What was your capacity with Ralston-Pilot
9 Publishers?

10 A. I filled orders and I did printer liaison,
11 printer research.

12 Q. Prior to January 1982, what was your occupation?

13 A. I was a member of the Sea Organization.

14 Q. Of the Church of Scientology?

15 A. I guess it's connected in some way.

16 Q. Since you left the Church of Scientology, you
17 have had two employments, one with the Ralston and the other
18 with this law firm that you have just described?

19 A. Yes.

20 Q. Mr. Armstrong, the reason that I have asked to
21 take your deposition is that Mr. Logan filed an affidavit
22 signed by you.

23 Now, I would like to ask you some questions
24 concerning how that affidavit came to be drafted, and that's
25 the purpose of our deposition today.

26 So can you tell me how this affidavit came to be
27 drafted?

28 A. Show me the affidavit first.

1 Q All right. Let me show you from my file a
2 notice of filing signed by Walt Logan, the attorney here,
3 dated 24 November 1982. Attached to it it says Affidavit of
4 Gerry Armstrong, which is signed apparently by you on
5 19 October 1982. You are free to look at it.

6 Are you familiar with that affidavit?

7 A Yeah, I'm pretty sure. I am.

8 Q Would you like to take a moment and review it?

9 A Just to look over to make sure.

10 Q Please take all the time you want. This is what
11 was furnished me by Mr. Logan. That is what I'm going to ask
12 you about. I want to make sure you understand what I am
13 asking you about.

14 A Okay.

15 Q Would it assist you, Mr. Armstrong, if I take
16 this out of my file and let you follow it when I question you?
17 Would that --

18 A No. You can ask me anything about it. I know
19 it quite well.

20 Q Tell me how this affidavit came to be drafted.

21 A I drafted it.

22 Q Did you write it out in longhand?

23 A Yes.

24 Q Do you have your original longhand drafts?

25 A No.

26 Q Are they still in existence?

27 A I rather doubt it.

28 Q How many drafts did you write out in longhand

1 before the final finished form that we see in this lawsuit
2 came to be typed?

3 A. One.

4 Q. How did you come to draft it? Were you requested
5 to draft it?

6 A. I was asked in speaking with Michael Flynn.

7 Q. That's the Boston attorney, Michael Flynn?

8 A. Yes.

9 He said that one of the defenses of the
10 organization was that Mr. Hubbard didn't have any residence
11 anywhere, and I said that was positively ludicrous because he
12 certainly did have a residence in California. I had been to
13 his residence many times. I knew it was his intention to live
14 in Southern California.

15 So he said, "Okay. Anything else?"

16 And I said, "Well, I have a lot of knowledge,
17 and I will write a statement up if you want."

18 And he said, "Fine." So there you go.

19 Q. When was that conversation with Michael Flynn?

20 A. It would have been a few days prior to whenever
21 this thing is.

22 Q. This affidavit was apparently signed by you on
23 October 19, 1982.

24 A. Yeah. I wrote it one day, typed it the next,
25 and sent it off.

26 Q. Did you physically type the affidavit yourself,
27 or did you have someone type it for you?

28 A. I typed the original myself.

1 Q Do you know if it was retyped by Mr. Flynn?

2 A Yes, it was.

3 Q Do you know if any changes were made from your
4 typed original to the one that was signed by you and filed in
5 this lawsuit?

6 A I believe that there may be an error in it now,
7 but the only thing is perhaps a grammatical error, and that's
8 the only change which I believe was made.

9 Q What was that error?

10 A I would have to look at it.

11 Q Why don't I detach my copy of the affidavit
12 filed by Logan.

13 (Off-the-record discussion.)

14 BY MR. JOHNSON:

15 Q Let me hand you a copy of what was filed by
16 Mr. Logan in the case at bar November 24, 1982, and which was
17 purportedly signed by you on October 19, 1982, and tell me
18 what error you are referring to.

19 Have you done so?

20 A Yes. The error was in this sentence.

21 Q Would you give me the --

22 A Page 6. It's Paragraph No. 10, the last sentence.

23 "In fact, none of us had ever met

24 Mr. Karno, and he was Mr. Hubbard's tax
25 attorney at the time."

26 And that deviated from my original statement.
27 It was not written something like that. This is a grammatical
28 variation from the way I originated it.

1 Q How did you originally write it?

2 A It may have been two sentences, but it didn't
3 have that construction there -- ",and" -- and I don't recall
4 exactly what it was, but when I reread this thing sometime
5 later, I saw that that was not my writing. It was -- there
6 may have been something else in there, but the gist of it is
7 exactly the same. "None of us had ever met Mr. Karno. He
8 was Mr. Hubbard's tax attorney at the time."

9 Q Are there any other changes from the way you
10 typed it originally as to what you now see as the finished
11 product with your signature?

12 A No.

13 Q What was the occasion of your talking to
14 Mr. Flynn in October of 1982 that led to this affidavit being
15 drafted?

16 A I was talking to Mr. Flynn. He represents me,
17 and we were talking.

18 Q In what matter does he represent you?

19 A He is my counsel.

20 Q Is he your counsel in connection with a
21 particular matter or litigation that's going on?

22 A I don't know how to answer that exactly. He's
23 not named as an attorney of record in the case in which I have
24 been named and am cross-complainant; however, he's my attorney.

25 Q When did Mr. Flynn become your attorney?

26 A In about May of 1982.

27 Q And for what matter did you engage him to
28 represent you in May of 1982?

1 A. I sought his advice.

2 Q. And where did you meet with him to seek his
3 advice?

4 A. Clearwater, Florida, or Clearwater Beach.

5 Q. In May, that was when the Clearwater City
6 Commission hearings were going on. Were you there during
7 the hearings?

8 A. I was there at the same time of the hearings,
9 I believe.

10 Q. As I recall, the hearings began May the 5th.
11 (Off-the-record discussion.)

12 BY MR. JOHNSON:

13 Q. My recollection, Mr. Armstrong, is the Clearwater
14 hearings conducted by the Clearwater City Commission in which
15 Mr. Flynn was the consultant and appeared during the hearings
16 occurred from May the 5th to May the 8th, 1982.

17 With that announcement, does that help your
18 memory as to when you were in Clearwater?

19 A. I already knew when I was in Clearwater. It's
20 during that time.

21 Q. What day did you arrive in Clearwater?

22 A. It was a Thursday.

23 Q. That would be May the 6th according to this
24 calendar.

25 And you went to the hotel in Clearwater Beach?

26 A. Yes.

27 Q. The Holiday Inn?

28 A. I believe so.

1 Q Was it your intention to appear as a witness at
2 the Clearwater hearings?

3 A No.

4 Q Were you asked to appear as a witness at the
5 Clearwater hearings?

6 A No.

7 Q The reason I asked that is Mr. Flynn announced
8 he had a surprise witness, and I wondered if you were he.

9 A I never heard such an announcement.

10 Q What was your purpose in going to Clearwater?
11 Solely to consult with Mr. Flynn --

12 A Yes.

13 Q -- about legal advice?

14 Did you know that he was in the process of
15 conducting hearings regarding the Church of Scientology at
16 that time?

17 A I knew he was in Clearwater. That's all I knew.

18 Q Did you observe any portion of the hearings?

19 A No.

20 Q Did you consult with him concerning his
21 presentation of the matter to the Clearwater City Commission?

22 A No.

23 Q How long did you remain in Clearwater?

24 A One day.

25 Q Did you meet or talk with any of the witnesses
26 called by Mr. Flynn to testify at the Clearwater City
27 Commission hearings?

28 A I met a number of them.

1 Q Can you tell me whom you met that testified at
2 the Clearwater City Commission hearings.

3 A I don't know who testified, so I can't say that.

4 Q Can you tell me whom you met that were down
5 there for the purpose of being there at the Commission hearings?

6 A Ron DeWolf.

7 Q Who else? Paulette Cooper?

8 A She -- I may have seen her. It was like in
9 passing, I believe, but I just --

10 Q Who else?

11 A Some guy who just got out of the Navy or was
12 still in the Navy. I'm not sure which.

13 Q Who else?

14 A George Meister.

15 Q Who else?

16 A That's all I recall right now.

17 Q Did you meet a Gabriel Cazares?

18 A No.

19 Q Or Mrs. Cazares?

20 A No.

21 Q Did you attend a cocktail party given in honor of
22 Mr. Flynn down in Clearwater during that period of time?

23 A No.

24 Q Did you talk to Ron DeWolf about any matters
25 relating to Scientology?

26 A Yes.

27 Q Can you tell me the subject of that conversation.

28 A I told him that I wanted to let him know that

1 his suspicions regarding who had been writing letters to him
2 in his father's name, signing letters as if from his father,
3 that in fact they did not come from his father, and that his
4 suspicions were accurate; and I informed him who the people
5 were who had been writing letters as if from L. Ron Hubbard
6 from 1971 or '67 onward.

7 Q And what was his response?

8 A He thanked me and he said that he had known that
9 all along and this just confirmed it.

10 Q And who did you tell him had been writing
11 letters to him, signing his father's name, from 1967 on?

12 A Mary Sue Hubbard, Aletheia Taylor, Kenneth
13 Urquhart, Pat Brice. That's who I recall.

14 Q Did you tell him how you learned this information?

15 A Yes.

16 Q And what did you tell him?

17 A I showed him a document which listed out all
18 the letters written to Ron DeWolf during that period of time.

19 Q Could you describe that document.

20 A Yes. It was a letter. I believe it was to
21 Mary Sue Hubbard, listing out who had written each one of the
22 letters. It dated all the letters, and it had initials beside
23 it and indicated that those were the people.

24 Q And who signed that letter to Mary Sue Hubbard?

25 A I believe -- I don't recall the signature.

26 Q But you still --

27 A My recollection is that it was Pat Brice.

28 Q You still have that document?

1 A. No.

2 Q. Where is that document now?

3 A. That document is in the LRH Archives.

4 Q. Did you have this document with you when you
5 talked to Ron DeWolf?

6 A. I had a copy.

7 Q. The document is now under order of court not
8 to be disseminated; is that correct?

9 A. I can't answer that. I don't know what that
10 means.

11 Q. Is there an order of court in any litigation in
12 which you are presently a party ordering that this document
13 and other documents not be disseminated or made public?

14 A. Am I going to be cited for contempt of court
15 for talking about it? Is that what you mean? I'm not
16 following this at all.

17 Q. What I'm trying to do, Mr. Armstrong --

18 A. I said that the document itself is in the
19 L. Ron Hubbard Archives. Now, there's a copy in court.
20 If that's what we're talking about, then I can't break into
21 the court and steal that document and give it away, if that's
22 what you mean. Am I allowed to talk about it? I think so.

23 Q. All right, sir.

24 After your first meeting with Mr. Flynn --
25 was that your first meeting with Mr. Flynn on May the 5th,
26 1982?

27 A. Yes, it was.

28 Q. And since that time, have you had any other

1 meetings with Mr. Flynn?

2 A. Yes, I have.

3 Q. Will you tell me on which occasions you have met
4 with Mr. Flynn.

5 A. I met with Mr. Flynn sometime in June -- June or
6 July.

7 Q. Where did that meeting take place?

8 A. In Hotel Bonaventure in Los Angeles.

9 Q. What was the purpose of that meeting?

10 A. To get advice from him and to examine the
11 likelihood of what was going to be done to me by the organiza-
12 tion.

13 Q. When did you next meet with Mr. Flynn?

14 A. I think in -- I think in October.

15 Q. Of 1982?

16 A. Yes.

17 Q. And where?

18 A. In New York.

19 Q. Where in New York?

20 A. In Long Island.

21 Q. In an office in Long Island?

22 A. No. In a hotel in Long Island.

23 Q. What hotel?

24 A. I don't recall.

25 Q. And what was the purpose of that meeting?

26 A. It was a -- to exchange ideas, information.

27 Q. About what?

28 A. About the ongoing litigation, about what the

1 organization would do.

2 Q Excuse me. May I interrupt. When you are
3 talking about the ongoing litigation, are you talking about
4 ongoing litigation against the Church of Scientology?

5 A. Theirs against me.

6 Q In October of 1982 what litigation was pending
7 against you by the Church of Scientology?

8 A. They had sued me.

9 Q In what jurisdiction?

10 A. In Los Angeles.

11 Q Was that in connection with certain archives?

12 A. Yes.

13 Q All right. When was that suit filed against you?

14 A. July or August.

15 Q And at that time was Mr. Flynn representing you
16 in connection with that ongoing litigation?

17 A. At what time are we now referring to?

18 Q We are talking now about in October of 1982
19 when you met in the hotel in Long Island.

20 A. As I have stated earlier, he was not named as
21 counsel, but he is my attorney.

22 Q He was rendering advice to you concerning the
23 ongoing litigation, was he not?

24 A. He offered assurance.

25 Q Do you know whether he's in contact with your
26 attorneys of record in that case?

27 A. I believe he is.

28 Q Who are your attorneys of record in that case?

1 A Contos & Bunch.

2 Q Are those the same attorneys whose office we are
3 now taking this deposition in?

4 MR. LOGAN: Au contraire.

5 MR. MAGNUSON: No.

6 MR. JOHNSON: Excuse me.

7 MR. MAGNUSON: These offices are unrelated to any
8 litigation involving any of the parties.

9 MR. JOHNSON: Okay.

10 Q Who was present at the meeting in New York in
11 October 1982 other than you and Mr. Flynn?

12 A Ron DeWolf, Gail O'Neill, George O'Neill, Abby
13 O'Neill, Bruce Bunch, Jocelyn Armstrong.

14 Q At your meeting in June or July in the Hotel
15 Bonaventure in Los Angeles with Mr. Flynn, who was present at
16 that time?

17 A Kima Douglas, Michael Douglas, Jim Dincalci,
18 Nancy Dincalci; there was a Rabbi Robbins, Gordon Freedman,
19 and my wife.

20 Q Your wife's name is Jocelyn?

21 A Yes.

22 (Off-the-record discussion.)

23 BY MR. JOHNSON:

24 Q What participation did these other persons take
25 in the meeting of June or July in the Hotel Bonaventure?

26 A They exchanged ideas. They recited their stories.

27 Q That was prior to any lawsuit being filed
28 against you by the Church of Scientology?

1 A. Yeah.

2 Q. So it had no relationship to any litigation
3 that you were a party to?

4 A. Yeah.

5 Q. It had no relationship?

6 A. Yes.

7 Q. How did it have a relationship to any litigation
8 in which you were a party? Do I understand your answer?

9 A. You asked me "Did it have no relationship ...?"
10 And I answered, "Yes." Isn't that a correct answer? There
11 was no ongoing litigation, so there was no relationship to be
12 had.

13 Q. Okay. You exchanged ideas and recited stories.
14 What were the ideas you exchanged concerning?

15 A. Concerning L. Ron Hubbard, concerning Scientology,
16 concerning our individual experiences regarding Scientology.

17 Q. Did you reach any conclusions at that meeting?

18 A. I personally did.

19 Q. What were they?

20 A. I felt that I could not run from the organization,
21 and that the only chance I had for survival was to assume as
22 high a profile as possible.

23 Q. So as a result of that, what did you do?

24 A. So as a result of that, I did a "20/20"
25 interview.

26 Q. When was your "20/20" segment taped?

27 A. Oh, July. July or August.

28 Q. July of 1982. So in other words, your "20/20"

1 segment was taped prior to the signing of this affidavit which
2 is filed in this lawsuit which we are concerned with today?

3 A. Yes.

4 Q. In the meeting at the Hotel Bonaventure in June
5 or July, is it fair to say that all the people present that
6 you have named, including Mr. Flynn, were anti-Scientologists?

7 A. I don't think so.

8 Q. Were any of them currently on staff with the
9 Church of Scientology?

10 A. No.

11 Q. Were any of them currently practicing
12 Scientologists?

13 A. Oh, I think so.

14 Q. You say you exchanged ideas and recited stories.
15 What was the nature of the ideas that you exchanged? Did they
16 have to do with any actions that might be brought against the
17 Church of Scientology?

18 A. No. It was never discussed.

19 Q. Could you say there was a general purpose of the
20 meeting?

21 A. To meet Michael Flynn. To exchange ideas.

22 Q. At that time you knew that Michael Flynn was a
23 leading anti-Scientologist?

24 A. I knew that Michael Flynn had been labeled a
25 supreme SP by the current hierarchy of the cult, but I'm not
26 sure about the "leading anti-Scientologist."

27 I tend to think that the leading anti-
28 Scientologists are within the organization.

1 Q Let me phrase it another way. At the time you
2 met in June or July at the Hotel Bonaventure, you knew that
3 Mr. Flynn was advising other counsel in a number of lawsuits
4 against the Church of Scientology?

5 A Yeah.

6 Q And you knew that he was the consultant to the
7 City Commission of Clearwater in presenting a hearing which
8 was designed to show the Church of Scientology in a bad light?

9 A I don't know all of what you have just said. I
10 don't know that he was the consultant to them. I know that
11 he was involved in the presentation. That's all I know.

12 Q That was concerning Scientology?

13 A Yes.

14 Q And you knew that, of course, when you first met
15 with him in May of 1982?

16 A What did I know of him?

17 Q That he had in excess of 23 lawsuits pending
18 against the Church?

19 A No, I didn't know that.

20 Q Did you know there were a large number of
21 lawsuits that he was involved in pending against the Church
22 of Scientology?

23 MR. LOGAN: Object to the form of the question. Vague
24 and ambiguous.

25 You can answer if you can. I'm just making an
26 objection for the record.

27 THE WITNESS: I didn't know that there was a large
28 number.

1 BY MR. JOHNSON:

2 Q Did you know that he was engaged in any lawsuits
3 against the Church of Scientology at the time that you met
4 with him in May of 1982 in Clearwater?

5 A I had heard about one.

6 Q Which one had you heard about?

7 A Von Schaick.

8 Q In Boston?

9 A Yes.

10 Q Had you heard that he was quite critical of
11 the Church of Scientology?

12 A Yes.

13 Q Who called the meeting at the Hotel Bonaventure
14 in Los Angeles in June or July of 1982?

15 A Let's rephrase. Who stated that location?

16 Q Who arranged for the meeting?

17 A Michael Flynn did and I did.

18 Q When did you contact Mr. Flynn to arrange for
19 the meeting at the Hotel Bonaventure?

20 A The day before.

21 Q And how was that contact made?

22 A He called me.

23 Q And you were able to get all these people on
24 short notice to appear at the Bonaventure on the following day?

25 A All of which people?

26 Q Well, Mr. and Mrs. Douglas, Mr. and Mrs. Dincalci,
27 Rabbi Robbins, Gordon Freedman.

28 A I was able to get four of those people.

1 Q Which four were you able to get?

2 A The Dincalcis and the Douglasses.

3 Q How about the rabbi? Who brought him?

4 A I don't know.

5 Q How about Gordon Freedman?

6 A I don't know.

7 Q And what did you tell the people, the Douglasses
8 and Dincalcis, was the purpose of the meeting with Mr. Flynn?

9 A To meet Michael Flynn.

10 Q All right. Let's go to the meeting in Long
11 Island in October of 1982. Who arranged for that meeting?

12 A Michael Flynn.

13 Q Did he consult with you prior to arranging the
14 meeting?

15 A Yes.

16 Q How long prior to arranging the meeting did he
17 consult with you?

18 A A couple of weeks.

19 Q And what did he tell you was the purpose of the
20 meeting?

21 A To meet those people.

22 Q Did you assist in obtaining the presence of any
23 of those people?

24 A Yes.

25 Q Which people did you contact?

26 A My wife.

27 Q Who else?

28 A No one.

1 Q How did the meeting in New York in October differ
2 from the meeting in Los Angeles at the Hotel Bonaventure?

3 A There were different people present. We
4 discussed different experiences. It was in a different
5 location. It wasn't the same meeting.

6 Q Was the purpose the same?

7 A Yeah.

8 Q What other occasions have you met with Michael
9 Flynn?

10 A I don't think I have.

11 Q So is it your testimony that you only personally
12 met with Michael Flynn in May in Clearwater, in June or July
13 in the Hotel Bonaventure in Los Angeles, and in October in
14 Long Island, New York?

15 A To the best of my recollection, yeah.

16 Q You never met with him in Boston?

17 A No. I have never been to Boston.

18 Q All right. Tell me on what occasions you
19 talked to Mr. Flynn by telephone.

20 A The end of April.

21 Q That was prior to your meeting him in Clearwater?

22 A Uh-huh.

23 Q Did you make arrangements to meet in Clearwater?

24 A Yes.

25 Q What else was discussed in the conversation in
26 April with Mr. Flynn?

27 A I said I was -- I was scared for my life. I
28 wanted to know what to do.

1 Q And what did he respond?

2 A He said, "Hang in there."

3 Q You mentioned a little earlier you taped a
4 segment for "20/20" in July or August of 1982. I saw that
5 segment, and I recall your saying that you feared for your
6 life. You recall that --

7 A Yes.

8 Q -- statement?

9 You also stated you carry a knife, you sleep
10 with a knife.

11 A I did then.

12 Q Are you still sleeping with a knife?

13 A There's one beside my bed.

14 Q Why do you sleep with a knife beside your bed?

15 A I have never moved it.

16 Q Pardon?

17 A I have never moved it. It's rather symbolic at
18 this point.

19 Q Well, the interviewer on "20/20" asked you if
20 you slept with a knife because you feared for your life, and
21 I recall your answer was "Yes."

22 A That was the case.

23 Q And when did you start sleeping with the knife?

24 A The end of April, beginning of May.

25 Q Was that after your telephone conversation with
26 Mr. Flynn you started sleeping with a knife?

27 A No.

28 Q Was it before your conversation with Mr. Flynn?

1 A. Yes.

2 Q. And you continued sleeping with the knife by
3 your bed in April of 1982 until when?

4 A. Let me see. Right up till now. It's still
5 there. I haven't moved it.

6 Q. And the purpose of that is to protect you in
7 case there is some assault against you?

8 A. No.

9 Q. What's the purpose of your sleeping with the
10 knife by your bed?

11 A. It reminds me.

12 Q. Of what?

13 A. Of the paranoia I went through.

14 Q. Could you tell me about the paranoia you went
15 through about the Church.

16 A. Yes. I was in absolute fear.

17 Q. When did your fear begin?

18 A. It began when they stole some photographs.

19 Q. When was that?

20 A. In April of 1982.

21 Q. Have you been threatened? Has your life been
22 threatened?

23 A. Yes.

24 Q. By whom?

25 A. By people employed by Scientology.

26 Q. Could you please give me the names of those
27 who threatened you.

28 A. I don't have the names.

1 Q. Would you tell me the first occasion when you
2 first were threatened by people employed by Scientology.

3 A. The first threat was the first Declare which
4 was brought out against me.

5 Q. Can you give me the date.

6 A. I believe it was in February, but I didn't get
7 it until April.

8 Q. So in April you received a threat, you say?

9 A. That's right.

10 Q. Tell me how the threat was communicated to you.

11 A. A friend sent it to me.

12 Q. What was the name of the friend?

13 A. Marilyn Brewer.

14 Q. Is Marilyn connected with the Church?

15 A. Yes.

16 Q. In what capacity?

17 A. I don't know.

18 Q. Was it in writing?

19 A. Yeah.

20 Q. Do you still have a copy of that threat?

21 A. Yes.

22 Q. Where is it located?

23 A. Home.

24 Q. And could you describe the written threat.

25 A. It's a Declare.

26 Q. I don't understand that.

27 A. A Declare is an order which is put out on one
28 who the current hierarchy of the organization deems is a

1 danger or may speak out or in some other way is viewed by them
2 as a threat, and they bring this out. It's a Declare, and
3 the purpose of it is to intimidate the individual who's named
4 and to create an atmosphere within the organization where it
5 then becomes okay to carry out covert operations, harassment
6 against the individual named in the Declare. That's the
7 purpose of these actions and the purpose of these broad
8 distributed mimeographed issues which are put out by the
9 organization.

10 Q What specifically did the Declare say?

11 A It said that I was -- I don't recall exactly,
12 but I was declared a Suppressive Person.

13 Q What else did it say?

14 A And it said that I was spreading rumors about
15 senior Scientologists. It listed a number of things. I don't
16 recall the whole thing.

17 Q What did it say specifically about your being
18 killed? You said it was a threat against your life. I would
19 like to know --

20 A Pardon?

21 Q How did it describe that you would be killed?

22 A You asked me when was the first threat. This
23 was the first threat.

24 Q Was there a threat to do you bodily harm?

25 A That is the implication of every one of those
26 Declares.

27 Q And what nature of bodily harm was to be done
28 to you?

1 A. Whatever the organization deemed was appropriate.
2 I was then fair game.

3 Q. Were you told by Marilyn Brewer that you would
4 be killed?

5 A. No.

6 Q. Did you report this Declare or threat upon your
7 life to any police organization?

8 A. You are misinterpreting some things. I never
9 said it was a threat upon my life. You asked when I received
10 the first threat. That was a threat. Declares are threats.
11 They are broadly publicized lies and opinions about individuals,
12 and they are threats.

13 Q. Well, you stated you started sleeping with a
14 knife by your bedside when you received this first Declare.

15 A. I did not say that.

16 Q. Well, when did you first start sleeping with the
17 knife?

18 A. After the organization stole photos.

19 Q. And who stole the photos?

20 A. Someone within the organization. I was told
21 that it was someone by the name of Lyman Spurlock.

22 Q. And how did he steal it?

23 A. He came and told a person who was holding the
24 photographs for me that I had been declared a suppressive
25 person. He showed him the Declare and took the photos.

26 Q. Who was that person who was holding the photos?

27 A. Virgil Wilhite.

28 Q. Did Mr. Spurlock take those photos by force?

1 A. I don't know. I think he took it by threat.
2 Mr. Wilhite informed me that he came to him, showed him the
3 Declare which had been written on me, and took the photos.

4 Q. What was the nature of the photos?

5 A. The photos were photos of L. Ron Hubbard.

6 Q. Were they taken by you in connection with your
7 duties with the Church?

8 A. No.

9 Q. Were they taken by you while you were on staff
10 of the Church?

11 A. No, they were not.

12 Q. When were they taken?

13 A. By what do you mean "taken"?

14 Q. Photographed. When were the negatives exposed
15 that resulted in these photographs?

16 A. They were taken in 1973 and in 1980.

17 Q. By whom?

18 A. By Jim Dincalci or by Kima Douglas.

19 Q. In connection with their duties with the Church?

20 A. I don't believe so.

21 Q. While they were on staff with the Church?

22 A. I don't believe so.

23 Q. Was Kima Douglas on staff with the Church in
24 1973?

25 A. She may have been.

26 Q. Was Jim Dincalci on staff with the Church in
27 1973?

28 A. No.

1 Q Were either of them on staff with the Church in
2 1980?

3 A I don't know.

4 Q So now we have that you considered Mr. Spurlock
5 demanding the return of the photographs to be a threat against
6 you?

7 A I went into the organization and requested the
8 photographs back and --

9 Q To whom?

10 A I requested them of Steve Marlowe and two other
11 individuals.

12 Q Do you recall their names?

13 A I requested -- and another individual, Terri
14 Gamboa.

15 Q Is she your former wife?

16 A Yes. And I was informed that they would not
17 give them back and that I should seek an attorney.

18 And I realized then that I was now the subject
19 of Fair Game and that I had no right to property, and I could
20 be lied to, cheated, stolen from, and that I could be destroyed.

21 Q Did Steve Marlowe and Terri Gamboa tell you
22 these things?

23 A I was the object of Fair Game. They refused
24 to give back the photographs. That is the gist of Fair Game.

25 Q When you are talking about Fair Game, did
26 Steve Marlowe and Terri Gamboa tell you you were subject to
27 Fair Game?

28 A No, they did not.

1 Q I'm trying to find out when you feared for your
2 life and started sleeping with your knife. Was this the
3 occasion?

4 A Two days subsequent to that, something like that,
5 a few days subsequent to that, I then received another Declare
6 which had been brought out by the organization.

7 Q Could you give me the date, please, sir.

8 A It was dated April 24. In that, it stated I
9 was promoting the research of LSD advocate Timothy Leary and
10 that I had stolen materials from the organization. And I
11 realized at that point that I was being set up, and I was the
12 subject of an operation by the organization, and I feared for
13 my life, and at that point I started sleeping with a knife.

14 Q This is what you described earlier as your
15 paranoia?

16 A Re-run that by me again.

17 Q This is the paranoia that you were talking about
18 earlier in your deposition here today?

19 A Yeah. It went on for -- into October.

20 Q So is it fair to say that starting on April 24
21 you became paranoid and it extended on into October of 1982?

22 A I would say that I coped with paranoia during
23 that period. I would not say that I was paranoid at all times.
24 Occasionally it got to me. It was a very, very heavy
25 experience, and it went on through October.

26 Q Did you seek any medical advice during this
27 period of time?

28 A I sought legal advice.

1 Q But no medical advice?

2 A No.

3 Q And you sought legal advice from Michael Flynn?

4 A Michael Flynn, Contos & Bunch.

5 Q And the materials that you talked about that
6 came out in the Declare of April 24 in which you were accused
7 of stealing materials from the Church, is that the archives
8 that's the subject of the lawsuit pending here in California?

9 A Run that --

10 Q You said that the Declare of April 24 accused
11 you of stealing materials from the Church; is that correct?

12 A Yes.

13 Q Were those the materials relating to the archives
14 which is the subject matter of the lawsuit pending here in
15 California involving you and the Church of Scientology?

16 A I think that is a question that you should ask
17 your client. I did not originate that document.

18 Q Well, did you not take into your possession a
19 number of documents from the archives of the Church?

20 A I had possession of those archives of the Church
21 from 1980 through 1981. I was given that by L. Ron Hubbard.
22 I was given that -- I worked on organization premises at
23 L. Ron Hubbard's -- based on L. Ron Hubbard's approval to work
24 on his personal archives. So, sure, I had possession of them.

25 Q And you stated earlier that certain documents
26 are in the files -- copies are filed with the court in your
27 lawsuit today?

28 A Yes.

1 Q And you mentioned, I think, in particular a
2 document, a letter to Mary Sue Hubbard signed by, you believed,
3 Pat Brice, which described the letters written to Ron DeWolf
4 by various persons?

5 A Yes.

6 Q Is that part of the same material that you are
7 talking about?

8 A Yes.

9 Q Now, did you turn that copy of that in to the
10 court?

11 A Yes.

12 Q And who would have the original of it?

13 A The organization.

14 Q And you don't have any copies?

15 A No.

16 Q What I'm trying to get at, Mr. Armstrong, you
17 talked about threats and your paranoia and sleeping with a
18 knife. Were there any actual physical threats or threats to
19 do you physical harm made by anyone? And if so, please tell
20 me by whom and when.

21 A The months of August and September I was
22 followed 24 hours a day by people employed by Scientology to
23 harass my wife and myself.

24 Q And who followed you, please?

25 A I don't have their names. They refused to
26 identify themselves.

27 Q Did you report this to any law enforcement
28 agency?

1 A. Yes, I did.

2 Q. To whom?

3 A. Costa Mesa City Police.

4 Q. And what happened? What resulted from it?

5 A. I reported it.

6 Q. Did they act upon your complaint?

7 A. They did initially, and they informed me of
8 the name of the first individual on whom I had filed the
9 report.

10 Q. And what is his name?

11 A. Gregory Osborne.

12 Q. And who is he?

13 A. He is someone apparently who is employed by the
14 Tin Goose Investigation Bureau or whatever the heck it is.

15 Q. Did you report this to your lawyer --

16 A. Yes, I did.

17 Q. -- Michael Flynn?

18 A. Yes.

19 Q. Contos & Bunch?

20 A. Yes.

21 Q. And what action did they take?

22 A. We filed a declaration in the Los Angeles
23 Superior Court.

24 Q. Is that still pending?

25 A. Yes.

26 Q. Was any other action, other than that declaration
27 that you have just described in connection with these people,
28 filed?

1 A. I don't know what has been taken.

2 Q. Were you followed after the declaration was
3 filed by your lawyers?

4 A. I have not observed being followed since the
5 hearing which was held in the Superior Court of Los Angeles on
6 September 24th. Prior to then, I was.

7 Q. So is it your testimony that you are now a party
8 to two lawsuits with the Church of Scientology? One has to do
9 with the archives, and the other has to do with your being
10 followed by Gregory Osborne?

11 A. No.

12 Q. How is my question inaccurate?

13 A. It was filed in that one case.

14 Q. All right. But I see you are now a party to two
15 lawsuits now pending involving the Church of Scientology.

16 A. It could be. I don't know how you classify them.

17 Q. Well, neither case has been resolved yet?

18 MR. LOGAN: Paul, I understood the testimony to be a
19 claim and counter-claim. Maybe that is what you are quibbling
20 over.

21 MR. JOHNSON: Well, what I'm really trying to find out,
22 really going to is his interest. The purpose of my question
23 and what I want to find out is if he is a party to any lawsuits
24 involving the Church of Scientology, and I understand he is
25 involved in one involving these archives. He's now told me
26 about one involving a claim in the Superior Court of Los
27 Angeles involving some harassment.

28 MR. LOGAN: I was trying to -- I picked it up as a

1 claim and counter-claim.

2 BY MR. JOHNSON:

3 Q Would you help us, then.

4 A He's right.

5 Q Could you tell me more about it, then.

6 A It's a claim and a counter-claim.

7 Q All one suit, then?

8 A Yes.

9 Q Oh. Who initiated the claim?

10 A The organization.

11 Q And then you filed a counter-claim alleging that
12 you were followed by Gregory Osborne?

13 A Yes.

14 MR. JOHNSON: Okay. Thank you, Walt. I did not
15 understand that.

16 Q Has there been any occasion other than what you
17 have told me of contacts by the Church? Have there been any
18 other occasions when you have been actually physically
19 threatened by the Church of Scientology or any representative
20 thereof?

21 A One guy said that he would kill me.

22 Q Who was that guy?

23 A I don't know.

24 Q Well, describe the circumstances and when it
25 occurred.

26 A He had just struck me with his car.

27 Q When?

28 A This was in the beginning of September.

1 Q Where?

2 A In Newport Beach.

3 Q How did it occur?

4 A He had followed my wife and myself when we left
5 work to go to lunch, and he followed us in a car and --

6 Q Along the highway?

7 A He followed -- he tailed us. He was employed
8 by the organization to do that.

9 Q And how do you know that?

10 A How do I know what?

11 Q That he was employed by the organization to do
12 that.

13 A I was told by the Los Angeles Police.

14 Q All right. Continue. I would like to find out
15 about it. This man followed you in his car and he ran into you.

16 A Yeah. I -- at one point I stopped my car, and
17 I went over to him to find out why he was following me, to get
18 him to identify himself. And he started to take off, and I
19 went around the corner to talk to him.

20 Q In your automobile?

21 A No. I was on foot.

22 Q And did he get out of his car?

23 A No. He was in his car.

24 Q You chased him on foot as he drove away?

25 A I was going this way, and he was coming this way,
26 and when I got over here, he went (indicating) and hit me.

27 Q As I understand it, you got out of your car and
28 started running after an automobile driven by this gentleman,

1 and you struck the automobile, or the automobile struck you?

2 A. The automobile struck me.

3 Q. And were you knocked to the pavement?

4 A. No.

5 Q. And what ensued when you were struck by the
6 automobile?

7 A. My elbow was bruised and cut, and I went -- I
8 stepped back on the curb, and my wife came up.

9 Q. She had gotten out of the car and walked over?

10 A. She came running up, and the guy turned around
11 and came back, and he rolled down his window and said, "You do
12 that again, and I will kill you."

13 Q. And what was he referring to?

14 A. He tried to -- then he said, "I've got the
15 witnesses that you hit my car." And then he came up later.
16 He followed us then. I went to the Costa Mesa Police and he --
17 when we drove in, he taunted us out of his window and said,
18 "They won't listen to you. You'll be out in a minute."

19 Then I drove to work, and he followed us to work,
20 and he came up and again threatened me and said, "You put a
21 dent in my car. I'll get you for this."

22 Q. In other words, apparently you had struck the
23 car with your fist. Is that what you did?

24 A. Didn't I say "elbow"?

25 Q. You struck the car with your elbow?

26 A. The car struck me.

27 Q. And he contended that you struck his car?

28 A. He threatened me.

1 Q Well, what was the outcome of your complaint
2 to the Costa Mesa City Police?

3 A They took down the information, and that was it.

4 Q Did you tell them that the gentleman who you
5 claimed had struck you with his car was waiting outside?

6 A I told them what he said when he drove by.

7 Q Did they go out and attempt to interview him?

8 A No.

9 Q When you drove away, and you say this gentleman
10 started following you, did you then drive back and report it
11 to the Costa Mesa City Police that you had located him and
12 ask that they take some action against him?

13 A I asked.

14 Q You drove back to the police station a second
15 time?

16 A I was in the Costa Mesa City Police Station, and
17 I reported it at that time, and I gave them a license number
18 at that time.

19 Q What was the date of this?

20 A September of 1982.

21 Q And what was the outcome of this complaint that
22 you made?

23 A Frankly, I don't know. I assumed that
24 Scientologists had bought off the Costa Mesa City Police, and
25 that's where it ended. It's a policy, after all.

26 Q And yet then you learned from the Los Angeles
27 Police about this same incident? You talked to someone in
28 the Los Angeles Police Department?

1 A Yes.

2 Q Who did you talk to in the Los Angeles Police
3 Department?

4 A I don't remember the guy's name.

5 Q What was his position with the Los Angeles
6 Police Department?

7 A I think that he was a detective.

8 Q In what division?

9 A I don't know.

10 Q What was the occasion of your talking to the
11 Los Angeles detective?

12 A He called me.

13 Q For what purpose?

14 A Harass.

15 Q To harass you?

16 A Uh-huh.

17 Q Did Scientology buy off the Los Angeles City
18 Police Department as well?

19 A I don't know. I can only speculate.

20 Q Do you suggest they did?

21 A I just don't know. I was appalled at what they
22 had done to this individual, what they had done and what the
23 scheme was.

24 Q So you are suggesting, then, that a detective
25 from the Los Angeles City Police Department called you to
26 harass you on behalf of the Church of Scientology?

27 A Yes.

28 Q And you also feel that when you made your

1 complaint to the Costa Mesa City Police Department, they were
2 bought off by the Scientologists and therefore would not act
3 on your complaint?

4 A. They certainly didn't act, did they?

5 Q. That's your belief that they were bought off?

6 A. I see that there's a possibility that that
7 happened. I know it's the policy of the organization.

8 Q. Do you know the name of the officer that you
9 gave your complaint to at the Costa Mesa City Police Department?

10 A. Yes.

11 Q. What was his name?

12 A. Sergeant Bechtel.

13 Q. Have you since been in contact with
14 Sergeant Bechtel?

15 A. Twice.

16 Q. And what occurred on the two occasions?

17 A. I gave him reports of what had happened.

18 Q. What was his response?

19 A. He would look into it.

20 Q. Do you think he's been bought off?

21 A. I don't know.

22 Q. Do you suspect it?

23 A. I don't know.

24 Q. Did you report this to your counsel?

25 A. Yep.

26 Q. Who did you tell this to?

27 A. Michael Flynn.

28 Q. Who else?

1 A. Contos & Bunch.

2 Q. Do you know what action they took to see if
3 there had been any buying off of the Costa Mesa City Police
4 Department?

5 A. I don't know.

6 Q. You are appearing here with Mr. Logan. He
7 doesn't represent you, does he?

8 MR. LOGAN: Paul, he's not appearing here with me. I'm
9 here to represent the plaintiffs. Now, listen --

10 MR. JOHNSON: I want to establish that.

11 MR. LOGAN: I will make it of record. I'm representing
12 the plaintiffs. The witness is here, I guess, as a subpoenaed
13 witness.

14 MR. JOHNSON: Walt, that's what I was trying to
15 establish. You shouldn't take offense.

16 MR. LOGAN: I think you probably should have known that
17 when you came in the door. I don't represent the witness.

18 MR. JOHNSON: That's what I said in my question.

19 My question is: you are not representing --

20 MR. LOGAN: He already told you who represents him.

21 MR. JOHNSON: Don't take offense. I was merely trying
22 to establish the record.

23 Q. In other words, you haven't talked to Mr. Logan
24 before coming here today?

25 A. Yeah.

26 Q. When did you meet with Mr. Logan?

27 A. Last night.

28 Q. And you discussed your testimony with him or

1 your proposed testimony with him?

2 A. I don't know what that means. I don't think he
3 asked me anything about my testimony.

4 Q. What was the purpose of the meeting?

5 A. To reassure me that he was legitimate.

6 Q. And how long did the meeting take place?

7 A. About an hour. .

8 Q. Where did you meet?

9 A. In a restaurant.

10 Q. Where?

11 A. In Santa Ana.

12 Q. And was that meeting prearranged?

13 A. Yeah.

14 Q. When was it prearranged?

15 A. The day before.

16 Q. And who arranged it?

17 A. Mr. Logan.

18 (Off the record.)

19 BY MR. JOHNSON:

20 Q. Mr. Armstrong, I asked you earlier about your
21 telephone conversations that you had with Mr. Flynn, and you
22 replied that you had talked with him in April, and may I go
23 back to that course of my questioning.

24 What other telephone conversations did you have
25 with Mr. Flynn since that first conversation of April of 1982?

26 A. Many.

27 Q. How frequently?

28 A. Once every couple of weeks at times, once every

1 day at times.

2 Q Who initiated your conversations with Mr. Flynn?

3 A Generally I did.

4 Q You live in Orange County and he lives in Boston.

5 Would you be talking to him from Orange County to Boston when
6 these telephone conversations took place?

7 A Generally Orange County to Boston.

8 Q Who paid for the telephone conversations?

9 A Some he does, some I do.

10 Q Have you kept track of the cost of the telephone
11 conversations with Mr. Flynn?

12 A No. But it's quite a bit.

13 Q Do you have an estimate to the best of your
14 ability to do so from April of 1982 to the present date the
15 cost to you of the telephone conversations you have had with
16 Mr. Flynn? I'm talking now about the charges for the long-
17 distance calls.

18 A A hundred bucks.

19 Q Have you been reimbursed for these calls by
20 anyone?

21 A No.

22 Q And do you have an estimate of the cost of
23 the conversations with you which he picked up?

24 MR. LOGAN: I want to object to that question -- the
25 form of the question. It calls for pure speculation, unless
26 there's a predicate that this witness knows anything about the
27 internal bookkeeping of Mr. Flynn's office.

28 MR. JOHNSON: Well, the purpose of my question is to

1 try and see if I can get a better answer as to how often he's
2 talked to Mr. Flynn. If he has any knowledge through a
3 statement from Mr. Flynn or any other type of billing
4 information, I would like to have that information.

5 Q If you know.

6 A You want to know how much he's paid?

7 Q Yes. On telephone conversations with you.

8 A I don't know.

9 Q So can you give me a better estimate of the
10 number of times you have talked with him on the telephone
11 from April of 1982 to the present time other than what you
12 have given me?

13 A You want to know a total?

14 Q Yes, sir.

15 A 40.

16 Q We've discussed your personal meetings with
17 Mr. Flynn which occurred on three occasions, 40 telephone
18 conversations you have had with Mr. Flynn. Tell me about the
19 correspondence you have had with Mr. Flynn.

20 A I've written him a couple of letters; maybe
21 I've written some affidavits.

22 Q Do you have copies of the letters you wrote to
23 him?

24 A No.

25 Q Could you tell me the subject about which you
26 wrote?

27 A Law.

28 Q I'd like to ask you about any other affidavits

1 that you have prepared for Mr. Flynn or have been furnished
2 to Mr. Flynn by you.

3 A. Okay.

4 Q. Can you please tell me first of all have you
5 furnished other affidavits to Mr. Flynn other than the
6 affidavit which is the subject matter of this deposition?

7 A. Yes.

8 Q. When was the first affidavit furnished to
9 Mr. Flynn by you?

10 A. I think June or July.

11 Q. And what was that in connection with?

12 A. Tonja Burdon.

13 Q. And that's in connection with the lawsuit
14 pending in the Middle District of Florida in the Federal
15 District Court?

16 A. I think that's where it is.

17 Q. And you knew that Mr. Flynn was counsel of
18 record for Tonja Burdon in that lawsuit?

19 A. I don't know. Is he?

20 Q. Yes. And tell me the circumstances about which
21 you prepared that affidavit.

22 A. He asked me did I know Tonja. I explained yeah,
23 I knew Tonja real well.

24 He said, do you know anything about these points.
25 I said, yeah, I know --

26 Q. What points did he ask you about?

27 A. About her being on the RPF, about what
28 educational facilities were made available to her, about

1 conditions on the ship, about her relationship with L. Ron
2 Hubbard, about what she was doing in Dunedin, Florida.

3 Q And how did you respond to him?

4 A I described to him what I did.

5 Q And did you initially write out the affidavit,
6 or did he prepare a draft for you and send it to you?

7 A He prepared a draft.

8 Q After you had had a telephone conversation with
9 him?

10 A Yes.

11 Q It was not a face-to-face meeting?

12 A We discussed -- we probably discussed it
13 earlier in the earlier meeting. Almost certainly.

14 Q Which meeting was that, sir?

15 A At a hotel.

16 Q The Bonaventure in Los Angeles?

17 A Yes.

18 Q That's the meeting which occurred in June or
19 July of 1982?

20 A Yeah.

21 Q Could you give me a better date than June or
22 July? Can you narrow it down any?

23 A No.

24 Q There's nothing that occurred in that two-month
25 period that would help you narrow down the date of the meeting?

26 A I could date it, but there's nothing here that
27 helps.

28 Q So at the meeting in the Bonaventure which was

1 attended by the other parties that you have mentioned, the
2 subject of Tonja Burdon came up, and you talked with him about
3 the areas that he wanted an affidavit on; is that correct?

4 A. May have. We definitely discussed her.

5 Q. Was Tonja Burdon discussed in the presence of
6 Kima Douglas and Mike Douglas and Jim Dincalci and his wife
7 and Rabbi Robbins and Gordon Freedman?

8 A. I don't know.

9 Q. They were all present in the room at the same
10 time, were they not?

11 A. No.

12 Q. This meeting that you described at the Bonaventure,
13 you were not all present together?

14 A. We were at times and we weren't at other times.

15 Q. And you just don't recall whether any of those
16 persons were present when Mr. Flynn discussed Tonja Burdon?

17 A. I don't -- he never really told me anything
18 about Tonja Burdon. I told him what I knew.

19 Q. How did the name Tonja Burdon come up?

20 A. It was significant in my life.

21 Q. Did you know that there was a lawsuit pending
22 at that time in which she was suing the Church of Scientology?

23 A. Certainly.

24 Q. And had you talked to Tonja about her lawsuit?

25 A. No.

26 Q. You have never talked to her about it?

27 A. No.

28 Q. Either before or after that occasion of the

1 meeting with Mr. Flynn?

2 A. No.

3 Q. So, then, initially you talked in person with
4 Mr. Flynn at the Hotel Bonaventure in June or July, and then
5 later in that same month you then talked to Mr. Flynn on the
6 phone about preparing an affidavit?

7 A. Yeah. It would be within a month I'm sure.

8 Q. And on how many occasions did you talk with him
9 about the Tonja Burdon affidavit?

10 A. I think -- I don't know. A couple of times.

11 Q. Then, as I understand your testimony, he had an
12 affidavit typed up and sent for your signature?

13 A. He sent me a rough draft, and I rewrote it.

14 Q. Do you have a copy of the draft which you rewrote?

15 A. I may have, but I rather doubt it.

16 Q. And then when you rewrote it, did you put it in
17 final form?

18 A. Yeah.

19 Q. And did you sign it?

20 A. Yeah.

21 Q. And the affidavit that's filed in the court is
22 typed by you and not by Mr. Flynn's office?

23 A. I would have to see that document.

24 Q. But you only signed one document?

25 A. I would have to see that document.

26 Q. You only recall signing it on one occasion?

27 A. I would have to see. Some of these things got
28 filed in various courts, and I don't know if that particular

1 one was. I wouldn't see any reason for it, but it may have
2 been, and I would have to see it. If it's done on a word
3 processor, then certainly it was done by me.

4 Q You have a word processor that you use?

5 A Yes.

6 Q And does Mr. Flynn's office use a word processor?

7 A I don't know, but I know that whatever he sent
8 me was like this type of typewriting, and I often typed up,
9 you know, justified margin with a word processor copy.

10 Q What make of word processor do you use in your
11 typing?

12 A Well, my --

13 Q I'm asking that because I may be able to
14 identify who prepared the final draft.

15 A The draft which would have come from my office
16 would have been done on a Compal.

17 Q Say it again.

18 A C-o-m-p-a-l.

19 Q Word processor?

20 A Yeah. I don't know who the printer is, but it's
21 a regular --

22 Q Which is used in the law office that you are
23 working in?

24 A Right.

25 Q What other affidavits have you signed for
26 Mr. Flynn?

27 A Run that by me again.

28 Q I was asking you about how many affidavits you

1 have signed at the request of Mr. Michael Flynn, and you have
2 described the one in the case at bar relating to the McLean
3 case which I have shown you earlier in the deposition, and you
4 have mentioned the one which is filed in the Tonja Burdon case,
5 which is what you have just told me about.

6 Have you signed any other affidavits for
7 Mr. Flynn either at his request or at anyone else's request
8 in any other lawsuit involving the Church of Scientology?

9 A. I originated an affidavit on the subject of the
10 non-religious nature of Scientology.

11 Q. And when did you originate that affidavit?

12 A. Oh, that would have been -- let me think. Maybe --
13 maybe August.

14 Q. Of 1982?

15 A. Uh-huh. Yes.

16 Q. What were the circumstances that led to your
17 originating the affidavit concerning the religiosity or non-
18 religiosity of Scientology?

19 A. I was speaking to Mr. Flynn about how the
20 various cases were going.

21 Q. Can you give me the date, please, sir?

22 A. Maybe August.

23 Q. And what was the occasion of your meeting with
24 him? Was this in Long Island?

25 A. No. This was in August. It was telephonically.

26 Q. Okay. When you say how the cases were going,
27 can you please be more definite about it. What cases were you
28 talking about?

1 A. "What's happening?"

2 Q I know. But you said how cases were going.
3 What cases were you referring to?

4 A. I don't even -- you know, I don't even know what
5 cases exist, you know. Maybe I could get a Lexis scan, and
6 we could all look at it. But I don't know, so I say, "What's
7 happening?"

8 Q Could I just --

9 A. Wait a minute. I'm over here at the edge, and
10 I am involved with this octopus-like thing which has an
11 intelligence bureau comparable to the CIA, and there's all
12 these lone individuals who are up against this thing going --
13 I don't know, so --

14 Q Is this part of your paranoia which you are
15 describing here now?

16 A. I am telling you the facts, and you are trying
17 to construe this into something else.

18 Q What I'm trying to --

19 A. I would call him up and say, "How is it going?"
20 And he would say, "Well, in this case we got a
21 favorable ruling, and this case" -- you know.

22 Q In other words, what I'm trying to find,
23 Mr. Armstrong -- and you are being very helpful now -- you
24 knew Mr. Flynn was involved or interested in a number of
25 different cases involving Scientology. Am I correct when I
26 understand what you are telling me that he was reporting to
27 you about the progress of a number of cases involving the
28 Church of Scientology; is that correct?

1 A. He would mention them. As far as reporting --

2 Q. Perhaps "reporting" is not a good word.

3 A. -- it makes me sound like I'm running the whole
4 subject of Scientologists' paranoia --

5 Q. Let me change the question.

6 He would discuss with you the progress of a
7 number of different cases involving the Church of Scientology?

8 A. Yeah, he might. You know, most of the time I
9 called this guy up because I would say, "Listen, you know,
10 things are pretty freaky out here, and I have just been hit"
11 or, you know, "There's -- The guy's standing right beside
12 me while I'm trying to make this call, and I don't know if
13 I'm going to be blown away any minute."

14 And he'd say, "Okay. I understand."

15 Q. When you say "blown away," are you talking about
16 being shot? What do you mean by "blown away"?

17 A. These guys weren't following me in cars. They
18 were following me bodily.

19 Q. Did anyone ever threaten to do you bodily harm?

20 A. I told you that.

21 Q. That was the car accident you reported to the
22 Costa Mesa City Police?

23 A. Run that by me again.

24 Q. You are talking about the car accident? That's
25 the only threat that you told me about.

26 A. Do you people do this to get that kind of a
27 word on the record? Is that the purpose of that?

28 MR. MAGNUSON: Move to strike. Not responsive.

1 THE WITNESS: Well, it was no accident, so I didn't
2 report a car accident to the Costa Mesa City Police.

3 BY MR. JOHNSON:

4 Q The car incident that you reported to the Costa
5 Mesa City Police that you already related, is that the only
6 occasion which you said you had ever been threatened?

7 A That's the only verbal threat. Everything
8 other than that I have taken as a threat and construe it as a
9 threat.

10 Q When you told Mr. Flynn on the telephone that
11 you didn't know if you would be blown away, what were you
12 referring to?

13 A A guy walking up to me right then. Right -- he
14 got out of his car, he's coming towards me, and I'm talking
15 on the telephone. And this guy is -- he's been following me
16 for a month, day in and day out. They've been outside my
17 fence; they've come up to my house and shined searchlights in
18 my window; they've come onto private property. And this guy
19 is coming toward me right now.

20 Q And where was this conversation being made?
21 Were you in a public telephone booth?

22 A Uh-huh.

23 Q In what location?

24 A Costa Mesa.

25 Q And you were calling Mr. Flynn in Boston from a
26 public telephone booth in Costa Mesa?

27 A Uh-huh.

28 Q Why would you choose that location to call him?

1 A Because I had been followed all day by these
2 guys, and it was driving me nuts.

3 Q Didn't you think it more appropriate to contact
4 the local police department in Costa Mesa rather than call a
5 Boston lawyer?

6 A No. I haven't found anyone outside of Mr. Flynn
7 who really understands that organization who is not an insider.
8 I have never found anyone who really understands, and that's
9 why I sought help from Mr. Flynn.

10 Q So you were fearful that a man that you said was
11 following you would somehow blow you away, so you called
12 Mr. Flynn long distance?

13 A No, that wasn't it. I called Mr. Flynn because
14 I was being followed. While I called Mr. Flynn on the phone,
15 this guy came right up to me.

16 Q Now, during this period of time you were
17 employed with the law firm that you told me you were working
18 for?

19 A Uh-huh.

20 Q Did you have access to telephones there in the
21 law firm?

22 A Yes.

23 Q Why did you choose to use a public phone out in
24 the shopping district?

25 A I was out with my wife at lunchtime, and I had
26 been followed from work down to where we had business and
27 where we had lunch, and I happened to be down there, and I
28 went to the nearest telephone.

1 Q To call the Boston attorney, Flynn?

2 A Yes.

3 Q And did you reverse the charges?

4 A I think I did on that occasion.

5 Q Did you frequently reverse charges?

6 A Huh?

7 Q You told him the reason you were calling him was
8 that you were fearful you were being followed and some harm
9 might come to you?

10 A I said, "This is an outrage. I can't believe
11 what's going on here, that we're talking about 1982. This is
12 not in Nazi Germany that people can get away with this sort of
13 thing." And I was freaked out. I was damn freaked out.

14 Q After you were freaked out and called Mr. Flynn
15 to report that you were being followed, you then asked him
16 what's happening in the lawsuits pending against Scientology?

17 A No. You said, "What did you call Mr. Flynn about?"

18 And I said I called him all the time and I
19 talked -- all sorts of things.

20 Q We're now talking about this phone booth in
21 this shopping center or gas station that you called him from
22 on the occasion that a man was following you, and you reported
23 you were being followed, and then you asked him what's the
24 status of the lawsuits; is that correct?

25 A No.

26 Q What was said about what's going on with the
27 lawsuits?

28 A On that particular occasion?

1 Q Yes, sir. You just told me that --

2 A No. You have to read it back, because I don't
3 believe -- you asked me some 30 questions ago about what did I
4 call Mr. Flynn about, and I said I called him about anything,
5 and I gave as an example -- I said, yeah, I called him, and,
6 you know, call him and what would I say? This event is
7 happening right before my eyes as I was talking to Michael
8 Flynn. So --

9 Q Go ahead.

10 A -- where was I when I would have talked to him
11 about --

12 Q Describe the location of this phone booth that
13 you called Mr. Flynn from.

14 A It's outside a shopping center.

15 Q And you reported you were being followed. Then
16 you asked him what's going on in the lawsuits; is that correct?

17 A No.

18 Q What did you tell me about, then?

19 A What do you want to hear about it?

20 Q I want you to finish telling me about the
21 lawsuits you asked him about.

22 A Okay. So on occasions I would ask him what's
23 happening, you know. "Any news? What's happening? Fill me
24 in. I want a little support out here. I'm not going" -- you
25 know.

26 Q And he would respond by telling you that perhaps
27 he had a good ruling in one case or the judge was considering
28 something else? He would give you a rundown?

1 A. Roughly. He may or he may not. I was not his
2 data bank, but I got assurance and I got support from the man,
3 and that was about it.

4 Q And then on this occasion, on calling him from
5 the phone booth in the shopping center, you then told him you
6 wanted to give him an affidavit about the religious nature of
7 the Church of Scientology?

8 A. No. I think you have misconstrued everything
9 that has gone on here. Let me say if we were talking about
10 the religious nature of Scientology, then it was probably
11 from my office.

12 Q But this occurred in July or August of 1982,
13 did it not? Your conversation on the telephone about the
14 religious nature --

15 A. Yes, it would be about then.

16 Q And tell me how that call originated and tell
17 me about that telephone call.

18 A. He mentioned that in one of the cases there
19 was -- they were waiting, I guess, for some ruling on the
20 religious nature of the whole thing, and I said --

21 Q Did he tell you the name of the case? Do you
22 recall the name of the case?

23 A. I think the Van Schaick case. I think that's
24 what it was.

25 And I said that, you know, possibly this is what
26 it would come down to in every one of these cases.

27 Q Did you offer to draft an affidavit concerning
28 the religious nature of Scientology?

1 A. We talked about it, and I said, well, here's what
2 it is from my experience at this time. This is what I have
3 observed, and this is my view of the whole thing, and I said
4 that I would -- if he wanted, I would draft an affidavit, and
5 he said --

6 Q. Did he suggest what should be in the affidavit?

7 A. No.

8 Q. So then what did you do?

9 A. So then I sat down and drafted an affidavit,
10 you know, within the next couple of days, typed it up, and
11 shipped it off.

12 Q. Did you use any resource persons to help you
13 in drafting the affidavit?

14 A. Resource persons?

15 Q. Did you talk to anyone else, former Scientologists
16 or Scientologists, to aid you in drafting this affidavit?

17 A. I don't think so.

18 Q. Did you use any materials, any books or writings?

19 A. Oh, I got a writing. It was a wonderful little
20 thing from L. Ron Hubbard to Helen O'Brien back in 1952 in
21 which he laid out that -- how he wanted the whole thing set up
22 and how the religious angle would be advantageous.

23 Q. And you included this in your affidavit?

24 A. I included a quote from it.

25 Q. And was the affidavit that was filed in the
26 Van Schaick case in Boston in the same form as you drafted
27 it out here in Costa Mesa?

28 A. I have no way of knowing that.

1 Q Well, you had to sign it and certainly you know
2 whether or not he made any revisions to your proposed draft.

3 A Well, we must clarify some things here.

4 Q All right.

5 A When the document left my hands, it was in the
6 final form as far as I knew. I wrote -- I wrote it, I signed
7 it, I shipped it off.

8 Now, if someone has, between the time it left me
9 and the time it arrived with Mr. Flynn or from the time it
10 went from Mr. Flynn to being filed in the court or subsequently
11 in the court -- if that thing has been altered, that's
12 something that I don't have any control over. However, I
13 originated the document, and I signed it and -- does that
14 explain it?

15 Q Other than the affidavits in the McLean case and
16 the Burdon case and in the Van Schaick case, all of which you
17 have described here today, what other affidavits have you
18 prepared and signed for Mr. Flynn?

19 A I don't know of any.

20 Q Have you given any affidavits in any other case
21 for any other lawyer involved in litigation with the Church
22 of Scientology other than Mr. Flynn?

23 A Yeah.

24 Q Will you tell me about those.

25 A That's in the case of Scientology vs. Armstrong,
26 and I prepared a declaration in that case, and I gave it to my
27 attorneys, Contos & Bunch.

28 Q Was that filed in the case?

1 A. I have no way of knowing. I believe it was.

2 Q. All right. Have you signed any other affidavits
3 in any other case involving the Church of Scientology?

4 A. Not to my recollection.

5 Q. All right, sir.

6 Let us return, then, to the affidavit which we
7 are concerned with in the McLean case about which I am
8 questioning you today.

9 What sources of information did you use to write
10 out the affidavit of Gerry Armstrong which was ultimately
11 signed by you on October the 19th, 1982, for the McLean case?

12 A. I used my own personal knowledge of events
13 referred to in there.

14 Q. Well, the reason I'm asking you that, you appear
15 to give a great deal of detail in some of the paragraphs that
16 I tried to determine if you had any documents that you used
17 in preparing this affidavit.

18 A. Could you be more specific and refer to one
19 paragraph or another? It's a very long declaration.

20 Q. I'll go through it paragraph by paragraph, but I
21 want to ask an initial question. You certainly remember
22 whether you used any document in preparing this affidavit?

23 A. To my recollection, I did not.

24 Q. Is it your recollection that this affidavit was
25 made from your memory without refreshing it from reading any
26 documents? You are free to look through it.

27 You are now looking through it. You may take
28 your time, of course.

1 A. So far I have not seen anything which actually
2 refers to documents, but in fact refers to events which took
3 place in my life other than the fact that when I'm testifying
4 as to documents which I did see at one time.

5 Q. There are a couple of occasions in there in
6 which you mention having looked at documents, and can you tell
7 me whether prior to writing this affidavit you had reviewed
8 those documents so you would be accurate in your affidavit?

9 A. I don't believe that I reviewed any documents at
10 the time of writing this affidavit.

11 Q. How long did it take you to write the affidavit
12 in question?

13 A. Five or six hours.

14 Q. And in these five or six hours, you were able
15 to write it out in the same form as it now appears except for
16 that one sentence, being the last sentence of Paragraph 10?

17 A. That's the only change that I know in it.

18 Q. All right. I'll be asking you a number of
19 questions about this affidavit. So that the record is clear
20 as to what we're talking about, when I'm referring to "your
21 affidavit" from here on out, I will be talking about -- unless
22 I specifically indicate the contrary -- the affidavit which
23 you signed on October the 19th, 1982, which has been filed
24 by Mr. Logan in the case of McLean vs. The Church of
25 Scientology.

26 Can we agree that's the affidavit?

27 A. That's fine.

28 Q. Now, you say in five or six hours you wrote this

1 out in the same form we now see it except for that one
2 sentence. And you now say that it was done from your memory
3 and recollection without referring to any documents. Is that
4 an accurate statement?

5 A. Yeah.

6 Q. And also it is accurate to say that you did not
7 consult with any other person to assist you in writing this
8 affidavit other than your telephone conversation with Mr. Flynn?

9 A. That's correct.

10 Q. Did Mr. Flynn suggest to you what should be in
11 the affidavit?

12 A. No.

13 Q. You did discuss with Mr. Flynn prior to writing
14 the affidavit that the affidavit would be relating to the
15 residence of L. Ron Hubbard in various places?

16 A. Mr. Flynn said that a defense is being put
17 forward that he doesn't reside anywhere and never intended to
18 reside anywhere, and I said, "My God, this is" -- "that's
19 ludicrous. I had everything to do with his residence in
20 Southern California for years."

21 And he said, "Great. Can you write up what you
22 know about it?"

23 So I said, "Fine," and I prepared that.

24 Q. Now, you discussed a number of names of places
25 in this affidavit, and perhaps it would be helpful to me to
26 initially ask you about the geographical location of these
27 places that you discuss.

28 You discuss a place called Hemet, H-e-m-e-t.

1 Can you describe when you are talking about Hemet in the
2 affidavit what you mean?

3 A. Hemet is a town in Southern California near
4 San Jacinto, and it's at the foot of Mount San Jacinto, and I
5 guess it's about 90 miles from Los Angeles, more or less east,
6 south of I-10.

7 Q. Is it near the desert?

8 A. It's variously considered in the desert or near
9 the desert. The desert really begins in about 20 miles beyond
10 that.

11 Q. And what size is the town of Hemet?

12 A. I guess 30,000.

13 Q. You discuss the Gilman Hot Springs. Can you
14 tell me about Gilman Hot Springs geographically.

15 A. Gilman Hot Springs is just off of Highway 79
16 about five miles from Hemet in San Jacinto.

17 Q. Is that five miles by road or five miles as the
18 crow flies?

19 A. Five miles by road.

20 Q. And what's the size of Gilman Hot Springs?

21 A. Well, Gilman Hot Springs used to have about
22 249 population when it had its own post office, and now I
23 don't know how many are there.

24 Q. Is it an incorporated town or city?

25 A. Not to my knowledge.

26 Q. Just sort of a place; is that right?

27 A. Whatever you would call such a place. It's
28 unincorporated, to my knowledge.

1 Q All right. You have mentioned La Quinta. Where
2 is La Quinta?

3 A La Quinta is about seven miles from Indio, seven
4 miles west, something like that.

5 Q How far is it from Los Angeles?

6 A I guess about one hundred twenty-some-odd miles,
7 and it's near -- between Palm Desert and Indio.

8 Q And you mention Indio. Can you tell me about it.

9 A Indio is on the I-10 Interstate, and it would
10 be, I guess, 130 or so miles, 140 miles from Los Angeles.

11 Q You mention Culver City, I believe.

12 A Culver City is -- I guess it's called a suburb
13 of Los Angeles, a district of Greater Los Angeles, and it's
14 to the south and east of the city.

15 Q How far from downtown Los Angeles?

16 A Ten miles.

17 MR. LOGAN: We would certainly stipulate that whatever
18 Rand McNally shows -- that would probably be more precise.

19 MR. JOHNSON: Thank you.

20 Q May we refer to Paragraph 1 of the affidavit,
21 and you may borrow my copy or use Mr. Logan's if he prefers.

22 What do you prefer, Mr. Logan?

23 MR. LOGAN: I don't care. One's a copy of the other.

24 BY MR. JOHNSON:

25 Q You are free to use my copy here.

26 A Okay.

27 Q You describe that you were in early 1976 in
28 charge of L. Ron Hubbard's Personal Communications Unit.

1 Could you describe what your duties were in being in charge of
2 his Personal Communications Unit.

3 A I received and transmitted telexes, coded and
4 decoded telexes, received personal communications to and from
5 Mr. Hubbard, that is, written communications, packaged these
6 things and got them onto and off of organizational communica-
7 tions lines.

8 Q Would this be comparable to a mail clerk in a
9 large organization?

10 A My --

11 MR. LOGAN: I will object to the form of the question
12 as vague and ambiguous. The term "mail clerk in a large
13 organization" has no definable meaning.

14 BY MR. JOHNSON:

15 Q Well, perhaps you understand what my question
16 is intended to elicit.

17 A Well, I was certainly more than a mail clerk
18 because I certainly handled more than mail.

19 Q You handled telexes?

20 A Telexes. I handled L. Ron Hubbard's
21 communications. I think you wouldn't really call someone who
22 handled the President's communications similar -- you
23 wouldn't call them a mail clerk. It's different.

24 Q When you say you handled the communications,
25 does that mean you took the communications that were by him to
26 other persons and transmitted them?

27 A Yeah.

28 Q Well, were they sealed or were they open to your

1 view?

2 A. Some were sealed; some were open. If I telexed
3 them, obviously they were open. Most of them coming from D.C.
4 were open.

5 Q. Was it his policy that any communications sent
6 to him would be sealed when they came in your hands?

7 A. No.

8 Q. And it is your testimony that you were in charge
9 of the Personal Communications Unit; is that correct?

10 A. That's correct.

11 Q. Did you know Mike Douglas?

12 A. Yeah.

13 Q. And a Ken Urquhart?

14 A. Yes.

15 Q. What positions did they have in the Communications
16 Unit?

17 A. Mike Douglas was the LRH External Communications
18 Aide. Ken Urquhart was the LRH Personal Communicator.

19 Q. Were you senior to them?

20 A. No.

21 Q. Were they senior to you?

22 A. Yes.

23 Q. Was your title Director of Communications?

24 A. I was the Deputy LRH Communications Aide.

25 Q. Who was your senior as Deputy LRH Communications
26 Aide?

27 A. Mike Douglas.

28 Q. So it would be fair to say that Mike Douglas was

1 in charge of LRH Personal Communications?

2 A. Not at King Arthur's Court.

3 Q. Mike Douglas was not in Dunedin, Florida?

4 A. No.

5 Q. Was Ken Urquhart at Dunedin, Florida?

6 A. Yes.

7 Q. Was Ken Urquhart your senior at Dunedin, Florida?

8 A. Yep.

9 Q. And he was in charge of the Communications Unit
10 in which you were deputy; is that correct?

11 A. By that you mean was Ken Urquhart the LRH
12 Personal Communications Aide?

13 Q. Yes.

14 A. No, he wasn't.

15 Q. Who was?

16 A. Mike Douglas.

17 Q. But at Dunedin, Florida, you worked under Ken
18 Urquhart?

19 A. If we bring this logic far enough, that would
20 mean that L. Ron Hubbard was in charge of his Personal
21 Communications Unit. So on that basis, I was in charge. It
22 was either me or L. Ron Hubbard.

23 Q. You tell me you were in charge, but then you
24 tell me Ken Urquhart was your senior.

25 A. L. Ron Hubbard was also my senior. Does that
26 mean that he was in charge?

27 Q. Well, I think we have established your title was
28 Deputy LRH Communications --

1 A. Aide. And I was in charge of L. Ron Hubbard's
2 Personal Communications Unit in King Arthur's Court.

3 Q. Is it not a fact that this means you routed
4 communications to and from L. Ron Hubbard?

5 A. I routed; I originated; I coded and decoded
6 telexes; I distributed mail; I packaged it; I took care of
7 security on it; I was in charge of the unit.

8 Q. Isn't it also true that most of the communications
9 from L. Ron Hubbard to others were sealed?

10 A. No.

11 Q. Well, how often did you personally confer with
12 Mr. Hubbard?

13 A. During what period?

14 Q. Let's start with the period at King Arthur's
15 Court in Dunedin.

16 A. Before he left, I spoke with him many times.

17 Q. On how many occasions?

18 A. On a daily basis.

19 Q. Did you speak to him on more than 10 occasions?

20 A. Yeah. I spoke to him every day.

21 Q. About what subjects?

22 A. "Hi. How are you?" "How's it going?" "How's
23 the unit?" "What's happening?"

24 Q. But your speaking to L. Ron Hubbard was merely
25 greetings, not detailed conversations?

26 A. Some were; some weren't.

27 Q. And on what subjects did you have detailed
28 conversations?

1 A. Oh, about how L. Ron Hubbard was not going to
2 get a Christmas because he had to work to save the Base from
3 all the mess-ups that the GO was getting involved in, and how
4 his radio and electronic gear in his office worked, and that
5 kind of thing.

6 Q. Anything else?

7 A. No. His main concern in those days was about
8 the operations and getting set up what they called the Flag
9 Land Base and getting the Guardians Office operating in
10 Clearwater.

11 Q. Well, you state in your Paragraph 1 that in
12 early 1976 L. Ron Hubbard was in Washington, D.C.

13 A. That's correct.

14 Q. When was he in Dunedin and when was he in
15 Washington, D.C.?

16 A. He was in Dunedin up to about March of 1976,
17 from December of 1975.

18 Q. You state in your affidavit that he fled from
19 Florida in February of '76. What is the source of your
20 statement that he fled?

21 A. I watched him depart. I knew what it was about.

22 Q. What do you mean by "fled"?

23 A. L. Ron Hubbard left with Mike and Kima Douglas
24 about 3:00 o'clock in the morning. He left in darkness, and
25 the packing up was very secretive. No one within the
26 organization was to know that he had gone. An elaborate
27 scheme was worked out whereby his communications were to be
28 answered as if he were still there, and the reason for this

1 was because cover of the United Churches had been blown for
2 Scientology in Clearwater, and L. Ron Hubbard's presence was
3 made known in the local press, and it was right after that
4 that he fled.

5 Q You see, Mr. Armstrong, I'm trying to find out
6 what you know of your own personal knowledge. You related
7 earlier about having a conference in a hotel in Los Angeles
8 with Mike and Kima Douglas, and I'm not interested in what
9 they may have told you. I'm interested in what you know.

10 Were you present when L. Ron Hubbard did his
11 packing?

12 A No. But I knew about it.

13 Q I'm talking now about what you know of your own
14 personal knowledge. You have made an affidavit in which you
15 have --

16 A I was there when the car was packed.

17 Q Let's just take it a step at a time. I'm
18 interested in knowing what you personally know, not what was
19 told you.

20 Where were your quarters in relation to the
21 quarters of L. Ron Hubbard?

22 A Across the -- they were -- I think there was
23 one apartment between us.

24 Q Were you on the same floor?

25 A May have been.

26 Q Are you sure of that?

27 A I think so.

28 Q And whose apartment was between you and L. Ron

1 Hubbard?

2 A. I don't recall.

3 Q. Did he have an office there at King Arthur's --

4 A. Yeah.

5 Q. Did you have occasion to go in his personal
6 lodgings, or were your contacts with him in his office?

7 A. I was in his personal lodgings for something or
8 other.

9 Q. What was that for, sir?

10 A. It seems to me I was getting something to ship
11 to him in Washington.

12 Q. This was after he left Dunedin?

13 A. Yeah.

14 Q. But during the time he was in Dunedin, you were
15 not in his personal quarters?

16 A. I don't believe so.

17 Q. Did he have a personal communicator?

18 A. Ken Urquhart.

19 Q. You were never his personal communicator, were
20 you?

21 A. No.

22 Q. And what was the function of a personal
23 communicator?

24 A. He originated programs or carried out programs
25 originated by L. Ron Hubbard; he got instituted L. Ron
26 Hubbard's orders; he maintained logs of -- logs and records
27 of L. Ron Hubbard's orders to Scientologists and kept a
28 record of when they were complied with and so on.

1 Q Who suggested using the word "fled" in your
2 affidavit?

3 A God. I mean who suggested it?

4 Q I suggest. I ask, for example, did Mr. Flynn
5 suggest that you might use that word in your affidavit?

6 A No.

7 Q Did you tell him you were going to use that word
8 "fled" or "fleeing" in your affidavit prior to writing it up?

9 A I don't recall specifically. I mean that's the
10 concept. The man -- even today the man has fled. He's fled.
11 There's no -- it's his pattern. The guy up and flees.

12 Q Does he do that frequently?

13 A Very.

14 Q How often does he flee according to your
15 knowledge?

16 A Well, within the short time that I have known
17 him, he's fled five or six times.

18 Q And you know that all of your own personal
19 knowledge?

20 A Yeah.

21 Q And you equate leaving Dunedin and moving to
22 Washington with "fleeing"? You equate that in your own mind?

23 A He fled.

24 Q Could you define -- I know perhaps counsel will
25 stipulate what the Webster's Dictionary will say about
26 "fleeing" -- but I want to know what your mental processes are.

27 Would you please define "fled."

28 A "Fled" is the past tense of "to flee," and "to

1 flee" is to leave suddenly in the face of viewed danger.

2 Q And that's what you meant when you put "fled" in
3 here?

4 A Yeah.

5 Q You say it was feared that this might be an
6 attempt to serve him with a lawsuit. What's the source of
7 that knowledge?

8 A Everyone there was alerted to the fact. Every-
9 one at Dunedin became -- it became a high security area.

10 Q What did L. Ron Hubbard tell you personally
11 about this subject, that there might be an attempt to serve
12 him with a lawsuit?

13 (Off-the-record discussion.)

14 (A luncheon recess was taken.)

15 (The pending question was read by
16 the reporter.)

17 THE WITNESS: I don't recall anything.

18 BY MR. JOHNSON:

19 Q Would you like to follow the affidavit, my
20 copy of your affidavit? Will that be helpful?

21 A That's fine.

22 Q Now, you described King Arthur's Court as a
23 condominium. Was that just your way of describing it
24 generally, or did you specifically mean a condominium as we
25 know it in the law?

26 A My understanding of it was it was a potential
27 condominium in the way we mean it in the law, but they had not
28 been able to sell the units at that time, and so they rented

1 them out or had a short lease of six months to Mr. Hubbard and
2 his personal people.

3 Q So it is really an apartment complex?

4 A It may have been. My understanding was that it
5 was designed -- intended as a condominium.

6 Q Now, we started to talk before lunch about the
7 phrase in the first paragraph "because it was feared there
8 might be an attempt to serve him with a lawsuit in Florida."

9 Since you obviously did not discuss that with
10 Mr. Hubbard, are you stating in your affidavit what someone
11 else told you other than Mr. Hubbard?

12 A Yes.

13 Q Who told you that?

14 A There were meetings at that time amongst the
15 staff. I was briefed by Mike Douglas, and I was briefed on
16 what would happen subsequent to their leaving and why they had
17 to leave.

18 Q Is it your testimony that Michael Douglas told
19 you that there was a fear that there might be an attempt to
20 serve Mr. Hubbard with a lawsuit in Florida?

21 A Yes.

22 Q Did you have any duties in connection with the
23 litigation or threatened litigation that was either existing
24 in Florida or proposed to be filed in Florida concerning the
25 Church of Scientology?

26 A I just observed communications go back and forth
27 between Mr. Hubbard and the Guardians Office, and I was aware
28 of the threat viewed by Scientology and Mr. Hubbard.

1 Q. How were you aware of a threat viewed by
2 Scientology and Mr. Hubbard?

3 A. Because Guardian Office personnel were brought
4 down to Dunedin to act as guards. Guardian Office personnel
5 came out to Dunedin to meet with Betty Orsini and other
6 individuals.

7 Q. Betty Orsini was a newspaper reporter, wasn't
8 she?

9 A. I believe so.

10 Q. Well, what did Guardian personnel meeting with
11 the newspaper reporter have to do with a threat to serve
12 Mr. Hubbard?

13 A. Because it was viewed that the organization had
14 come in fraudulently, and the people within the organization
15 perceived an attack against the -- Scientology and Mr. Hubbard.

16 Q. You keep saying "It was viewed" or "It was
17 feared." What I'm trying to find out, Mr. Armstrong, is who
18 it is that you are talking about in this affidavit. That's
19 what I'm trying to get at. I want to know what you know of
20 your own personal knowledge.

21 A. I saw many dispatches between Mr. Hubbard and
22 the Guardians Office. I saw when Mr. Hubbard brought the
23 seniors of the Guardians Office out to Dunedin and briefed
24 them on handling of the attacks. I saw --

25 Q. What kind of attacks are you talking about?

26 A. What he perceived as attacks. The fact that
27 security in his opinion was blown, the fact that his -- his
28 plan to come in under the name of United Churches had blown up

1 virtually in his and Scientology's face, and they became known
2 as Scientology -- his presence became known. It was published
3 in the newspaper, and it was at that time when he decided to
4 flee, and he and the Douglasses late at night, early in the
5 morning, fled.

6 Q. You are saying at that time he decided to flee.
7 Are you attempting to testify to what went on in his mind
8 based on some surmise you have?

9 A. The only other possible explanation for it was
10 that they kidnapped him.

11 Q. So what you are saying, this is an assumption
12 of yours that he fled from Dunedin?

13 A. I observed the flight.

14 Q. You said you had never been in his apartment.
15 You said you never talked to him about a flight. So is it not
16 true that this was an assumption that you were making?

17 A. No, it's not.

18 Q. Well, if you didn't talk to Mr. Hubbard, how
19 could you tell what he perceived in his mind?

20 A. I was briefed by Mike Douglas, who left with
21 Mr. Hubbard at that time.

22 Q. So, then, what you are doing is you are saying
23 Mike Douglas told you that they were leaving because of
24 perceived or threatened lawsuits? Is that the sum and substance
25 of what your testimony is about this?

26 A. That definitely was a part of it -- to be
27 briefed by one's senior about the fact that "The cover has
28 been blown. We have to get out of here. The old man doesn't

1 want to be served. So, here, I'll be in touch with you, and
2 this is the way I'll communicate to you."

3 Q That's very helpful. So what you are telling me,
4 then, is this Paragraph 1 is based upon what Mike Douglas told
5 you that he believed, and you are basing it on what you heard
6 from Mike Douglas?

7 A Part of Paragraph 1 is based in part on what I
8 was told by Mike Douglas. Not all of Paragraph 1 is based in
9 total on what I heard from Mike Douglas.

10 Q What else in Paragraph 1 do you know without
11 being told by another person, in this case Mike Douglas?

12 A To begin with, that I was in charge of L. Ron
13 Hubbard's Personal Communications Unit. I was in charge.
14 Mike Douglas did not inform me of that. I was there and I
15 perceived that I was in charge.

16 Q What else in Paragraph 1 did you learn not --

17 A "My job at Dunedin entailed, among other
18 duties, relaying mail and telexes between Mr. Hubbard and
19 Washington, D.C., and various Scientology organizations in
20 Florida, California, and elsewhere."

21 Mr. Hubbard was at that time in Washington, D.C.,
22 with a small personal staff.

23 Q Do you know that of your own personal knowledge?

24 A Well, I sent communications to him, and I was
25 informed that he was there at that time.

26 Q By whom? I don't mean to interrupt.

27 A By people with whom I was in communication.

28 Q But give me the names, please. I need to know

1 what you know, not what someone else told you.

2 A. Okay. Michael Douglas.

3 Q. So, then, other than what Mike Douglas told you,
4 the only thing you know of your own personal knowledge in
5 Paragraph 1 is you say you were in charge of communications
6 and what your job at Dunedin entailed; is that correct?

7 A. No, it's not correct.

8 Q. Tell me how it's incorrect. I'm trying to find
9 out what you know, not what somebody told you.

10 MR. LOGAN: I'm going to object. There's no question
11 now as to this form of interrogation. If you want to ask a
12 question, I think it's proper, and he gave you an answer. I
13 don't think that's a question.

14 BY MR. JOHNSON:

15 Q. So that I may not misunderstand you, is it
16 correct that the only thing you know of your own personal
17 knowledge is that you were in charge of the Personal
18 Communications Unit --

19 A. No, that's not true.

20 Q. I haven't finished.
21 -- which you previously described your position
22 as Deputy --

23 MR. MAGNUSON: Deputy Director?

24 Deputy LRH Communications Aide.

25 BY MR. JOHNSON:

26 Q. You know of your own personal knowledge you were
27 in charge of his personal communications, and you described
28 your position as Deputy of LRH Communications, that your job

1 at Dunedin entailed relaying mail and telexes between
2 Mr. Hubbard and Washington, D.C., and various Scientology
3 organizations in Florida, California, and elsewhere, but
4 everything else in Paragraph 1 you learned or is based upon
5 conversations with Mike Douglas; is that an accurate statement?

6 A. No.

7 Q. Okay. How is it not accurate?

8 A. I observed L. Ron Hubbard leave the premises.

9 I was well aware --

10 Q. May we stop just a moment.

11 You were up at about 3:00 o'clock in the morning?

12 A. Yes.

13 Q. And tell me exactly what you observed.

14 A. I observed L. Ron Hubbard and Kima Douglas and
15 Mike Douglas get into the car, and I observed them leave. I
16 watched it being packed. I was briefed by Mike just prior.

17 Q. Let's talk about what you personally observed.

18 A. I observed Mike brief me. I observed the
19 article which came out in the newspaper. I was --

20 Q. You don't mention any newspaper in Paragraph 1,
21 do you?

22 A. You asked me what I observed.

23 Q. I'm trying to find out -- and I apologize if
24 I'm being somewhat tedious. I'm trying to find out what you
25 know and not what someone else told you, and so far the only
26 thing you told me that you know about Paragraph 1 is that you
27 were in charge of communications and your job entailed
28 relaying mail and telexes. That's the only thing you told me

1 that you know of your own personal knowledge, and I want to see
2 if you know anything else of your own personal knowledge.

3 A I saw L. Ron Hubbard leave early in the morning.

4 Q All right.

5 A I saw him and Mike and Kima leave.

6 Q All right. What else?

7 A What else about his flight do you want to know
8 about?

9 Q What else --

10 A I did not follow the car. I was not in L. Ron
11 Hubbard's mind. I did observe him leave.

12 Q You did not observe him packing?

13 A No. But I observed the car being packed.

14 Q And you did not talk to him about his leaving?

15 A No. But I talked to Mike Douglas about his
16 leaving.

17 Q You already told me that.

18 A All right.

19 Q All right. Let's go to the next paragraph,
20 please. Paragraph 2. We here again see the name Mike Douglas.

21 Are you quite close to Mike Douglas? Are you a
22 friend of his?

23 A Yes.

24 Q Do you see him often?

25 A No.

26 Q How often do you see Mike Douglas?

27 A I've seen him four times in the last three years.

28 Q And how about his wife Kima Douglas? How often

1 have you seen her?

2 A. About four times in the last three years.

3 Q. One of those times was at the meeting at the
4 Hotel Bonaventure --

5 A. Yes.

6 Q. -- in Los Angeles with Mr. Flynn and others?

7 And you invited Mike and Kima Douglas there to
8 be present at the meeting. Now, at that meeting did you
9 discuss with Michael Douglas the information contained in this
10 affidavit, Paragraphs 1 and 2?

11 A. I don't believe so.

12 Q. When was the last time you had a conversation
13 with Mike Douglas about the matters that you have alleged in
14 Paragraphs 1 and 2 where Mike Douglas's name is mentioned?

15 A. Maybe six months ago.

16 Q. And what was the occasion of that?

17 A. We were at a friend's place.

18 Q. Will you tell me more about that.

19 A. That subject happened to come up.

20 Q. Well, six months ago -- that would be --

21 A. I think that was in the summertime.

22 Q. That would be what? In July, August?

23 A. Something like that.

24 Q. Well, let's put it in relationship to other
25 things that you have done. Sometimes it helps to do that.

26 You were interviewed by "20/20" in July or
27 August. Was it before or after you were interviewed by "20/20"?

28 A. After.

1 Q And was the meeting prompted by the interview
2 you had with "20/20"? 1

3 A No.

4 Q What was the occasion of your being at the
5 friend's house with Mike and Kima Douglas?

6 A It was a birthday party.

7 Q Who was the friend whose home you were at?

8 A Jim Dincalci.

9 Q He's the same Jim Dincalci who also appeared at
10 the meeting at the Hotel Bonaventure with Mr. Flynn and others?

11 A Yeah.

12 Q And Nan Dincalci was there as well?

13 A Nancy.

14 Q Nancy. Oh. And your wife was there?

15 A Yeah.

16 Q And who else was there?

17 A I think -- what's his name? Bill Fosdick.

18 Q Does he have a connection with Scientology?

19 A I think so.

20 Q What has been his connection with Scientology?

21 A He's a Scientologist.

22 Q Is he on staff?

23 A No.

24 Q Has he been?

25 A Yeah.

26 Q When did he leave staff?

27 A I think -- let's see. Nineteen seventy- --

28 January 1979.

1 Q All right. Who else was there?

2 A His wife.

3 Q Anyone else?

4 A His daughter.

5 Q What is her approximate age?

6 A A year and a half.

7 Q Who else was there?

8 A I think that's all.

9 Q And during the course of this birthday party,
10 you and the Douglasses and the Dincalcis discussed LRH leaving
11 Dunedin and going to Washington?

12 A Well, Mike just -- Mike mentioned something
13 about it.

14 Q And then what did you all say to one another
15 about it?

16 A I don't know that there was any answer.

17 Q Was it that conversation that you had with
18 Douglas on which you base the allegations in Paragraphs 1 and
19 2 of your affidavit?

20 A No. He never said anything about this.

21 Q And you did not utilize anything you learned
22 in that conversation six months ago in writing that affidavit
23 concerning what happened in Dunedin in 1976?

24 A No.

25 Q So is it safe and fair to say, Mr. Armstrong,
26 that since you did not consult with any documents or notes
27 prior to writing your affidavit and you did not consult with
28 Mike Douglas or his wife or Mr. and Mrs. Dincalci concerning

1 the events of 1976 in Dunedin and Washington, that you are
2 relying strictly on your memory as to what occurred back then
3 some six years ago?

4 A. I think that's true.

5 Q. All right, sir.

6 In Paragraph 2, you said you received orders
7 from Michael Douglas, your senior. Was that a written order
8 or a verbal order?

9 A. Written.

10 Q. Do you have a copy of that written order?

11 A. No.

12 Q. Do you know if a copy is still in existence?

13 A. I don't know.

14 Q. You have not seen it since you have been
15 talking to Mr. Flynn? No one has exhibited this order to you
16 since you have been meeting with Mr. Flynn?

17 A. No.

18 Q. Now, you use the language you had an order from
19 Michael Douglas to set up a permanent residence in Southern
20 California for Mr. Hubbard. Now, did that written order which
21 you say you received contain the words "permanent residence"?

22 A. Yeah, or the concept to that effect.

23 Q. Well, now, that was not my question. You were
24 aware, were you not, in your conversation with Mr. Flynn, that
25 Mr. Flynn wanted an affidavit from you relating to
26 Mr. Hubbard's residence. You already told me that; is that
27 correct?

28 A. Uh-huh.

1 Q You said "Yes"?

2 A Yes.

3 Q You see, I'm trying to ascertain whether this
4 language "permanent residence" that you have written in
5 Paragraph 2 is a concept that you would like to get across in
6 order to aid Mr. Flynn or to aid the plaintiffs in this case,
7 or was that actually written down in the written order you
8 received from Michael Douglas?

9 A Well, I think that what I was trying to convey
10 was the truth of the situation, and, additionally, if it did
11 not say "permanent residence," it at least conveyed that
12 concept. That was the plan. That was the -- where we were
13 going.

14 Q Could I ask you to please be responsive to my
15 question. My question is: in the written order you received
16 from Michael Douglas, did it contain the words "permanent
17 residence" to be set up in Southern California for Mr. Hubbard?

18 A I don't recall.

19 Q Well, tell me, to the best of your recollection,
20 what the written order stated.

21 A There was a number of them. They all had to do
22 with what to take, where to go, who to meet, when to go, when
23 we would expect Mr. Hubbard and Mrs. Hubbard, and that this
24 was going to be a staging area, and there was already word
25 to locate a permanent residence.

26 Q All right. Now, you understand the importance
27 of the words "permanent residence," do you not?

28 MR. LOGAN: Object to the form of the question as vague

1 and indefinite.

2 BY MR. JOHNSON:

3 Q Well, let me ask you: do you understand that
4 "permanent residence" has a significance in this lawsuit? The
5 words "permanent residence."

6 A My understanding is that "residence" does.

7 Q Have you seen any of the pleadings or the
8 memorandums of law that have been filed in the McLean case,
9 this lawsuit with which we are concerned here today?

10 A No.

11 Q You have not read any memorandum of law filed
12 by me or my associates discussing the words "permanent
13 residence"?

14 MR. LOGAN: I object to the question as redundant. He
15 can answer it if he wants.

16 THE WITNESS: No.

17 BY MR. JOHNSON:

18 Q Have you discussed with Mr. Flynn or with any
19 other attorney the importance of establishing for the
20 plaintiffs that Mr. Hubbard had a permanent residence in the
21 United States?

22 A I don't believe the word "permanent" ever came
23 up, but definitely "residence" did. I was appalled by the
24 attempt of the organization to lie on that count.

25 MR. JOHNSON: Will you read my question back again. I
26 want to see what I asked.

27 (The record was read by the reporter.)

28 MR. JOHNSON: I want to strike the voluntary,

1 gratuitous announcement by Mr. Armstrong about his being
2 appalled at something happening as being completely
3 irrelevant, nonresponsive to my question, and having no
4 relevancy whatsoever to this deposition.

5 MR. LOGAN: You can certainly move to do so, but
6 without a judicial appointment, I doubt that you can strike it.

7 MR. JOHNSON: Well, if I didn't say "move to do so,"
8 that was my intent.

9 Q I would also like to respectfully request,
10 Mr. Armstrong -- I think we can get along much more quickly
11 if you confine your answer to the questions and not give vent
12 to your personal mental processes. I think we can move along
13 much faster. I say this as a suggestion.

14 Let's talk about the orders. There were a
15 number of orders that you received. How many orders did you
16 receive from your senior, Michael Douglas, on the subject of
17 establishing a residence in California?

18 A There were a couple which had to do with that
19 specific subject. There were many that had to do with the
20 process of moving to Southern California.

21 Q Now, my question, then, is: of the couple of
22 orders, which I assume you mean the two from Michael Douglas
23 relating to setting up a residence in Southern California, did
24 either of those orders or any order specify or use the word
25 "setting up a residence for Hubbard"?

26 A Yes.

27 Q All right. Do you know if there is a copy of
28 that order in existence today?

1 A I don't know.

2 Q Have you seen such an order since 1976?

3 A No.

4 Q And your Paragraph 2 is based upon your
5 recollection of an order which you read in May of 1976?

6 A No.

7 Q What is it based upon, then?

8 A Paragraph 2 contains a number of other data
9 which have nothing whatsoever to do with that.

10 Q Let me see if I can limit it.

11 The phrase in Paragraph 2 that says: "In May of
12 1976 I received orders from Michael Douglas, my senior and
13 Mr. Hubbard's personal communications expert who was with him
14 in Washington, D.C., to set up a permanent residence in
15 Southern California for Hubbard" -- that sentence is based
16 solely upon your recollection today of what you read in 1976;
17 is that correct?

18 A Read, relayed, spoke.

19 Q Since May of 1976, have you seen any document
20 which would support or corroborate your statement in
21 Paragraph 2 that there was a permanent residence to be set up
22 in Southern California for Hubbard?

23 A Yes.

24 Q And what is that, sir?

25 A These were Hubbard's communications to his
26 messengers; communications to be relayed to an attorney by
27 the name of Boudin; they were communications which were given
28 to me; there were orders which I carried out; there were the

1 subsequent events which went on; there were the orders which
2 Mr. Hubbard originated to me. That's all I can think of
3 right now.

4 Q You were talking about written communications
5 to his messengers. What were the dates of these written
6 communications to his messengers which mentioned the words
7 "permanent residence"?

8 THE WITNESS: Can you go back to the question asked
9 prior to my listing out these items?

10 MR. JOHNSON: And after you read that, could you also
11 read that answer so he'll have it fresh before him.

12 (The record was read by the reporter.)

13 THE WITNESS: Just to clarify, there was -- your prior
14 question did not ask for communications or whatever which
15 stated that -- had the words "permanent residence," but asked
16 if there was any information or documentation or whatever
17 to corroborate my claim in Paragraph 2 that it was the
18 intention to set up a permanent residence. That's my under-
19 standing of it.

20 Now, I do not recall the use of the words
21 "permanent residence" in any of these dispatches. Always the
22 term was used "residence" or "home," and my understanding
23 would be that if it was not permanent, then it was temporary,
24 and "residence" never -- the use of the word "residence" or
25 "home" never referred to "this is just sort of a jumping-off
26 point." It was always a residence when that was used.

27 So I don't recall the use of the words
28 "permanent residence," but I do recall the use of the word

1 "residence" and that is what I understand as a permanent
2 residence. It was not a hotel. Okay?

3 So now we can look at the correspondence and
4 the events which would substantiate and corroborate what I
5 said here; is that what we are looking at?

6 BY MR. JOHNSON:

7 Q Well, let me proceed with that, Mr. Armstrong.
8 Then the use of the words "permanent residence" -- the word
9 "permanent" was your choice of word that you inserted in this
10 affidavit which was not based upon anything that was written
11 that you ever read?

12 A The use of the word "permanent" there was partly
13 to differentiate it from the fact that Mr. Hubbard had had
14 temporary residences, to wit, a six-month lease at King
15 Arthur's Court and subsequently a brief stay in Washington, D.C.
16 It was understood that those were temporary residences, but
17 that now it was time to have a permanent residence.

18 (Off the record.)

19 BY MR. JOHNSON:

20 Q Well, going back to my question, then, the
21 choice of the word "permanent" is your conclusion, is it not?

22 A The choice of the word "permanent" is mine, but
23 the concept is what was conveyed to me in orders from Michael
24 Douglas on what they were going to be doing.

25 Q Well, you had said earlier in your testimony
26 here today that you knew of five different moves that
27 Mr. Hubbard made, did you not?

28 A Yeah.

1 Q Well, how many of those moves you are talking
2 about were prior to his being in Dunedin?

3 A One.

4 Q So, then, four of the moves of which you have
5 personal knowledge were made after you have stated in your
6 affidavit he was creating a permanent residence?

7 A That's correct..

8 Q Well, then, on reflection would you not agree
9 that your choice of "permanent residence" is inappropriate?

10 A Not at all.

11 Q Did he have a permanent residence at each place
12 that he left, the five places he left? Were each of those
13 permanent?

14 A They -- the idea was that each one of them was
15 permanent.

16 Q Maybe we better get back --

17 A Only when he envisioned or something happened,
18 he felt there was going to be -- he was going to be sued or
19 the Feds were coming or something, did he up and flee.

20 Q Well, perhaps you ought to tell me how many
21 permanent residences, in your opinion, he had after he left
22 Dunedin. I'm speaking of L. Ron Hubbard.

23 A There were two locations which I was informed
24 were his residences subsequent to Dunedin.

25 Q Where were they located?

26 A One was in La Quinta and one was in Gilman Hot
27 Springs.

28 Q Were each of these residences in your judgment

1 permanent residences?

2 A. They were intended as permanent residences.

3 Q. By whom?

4 A. By Mr. Hubbard.

5 Q. Perhaps this is a good time to tell me how you
6 knew his intentions.

7 A. Written communications from him which I saw;
8 the fact that he had work done to these things at great
9 expense, which is not the sort of work which you would have
10 done to a hotel room.

11 Q. Let's talk about the written communications.
12 Sometimes the memory of man is such that after the passage of
13 five or six years, we all tend to forget some details, but a
14 writing is there for as long as it exists.

15 Tell me about the writings that you say that
16 stated he would set up a permanent residence at La Quinta and
17 Gilman Hot Springs.

18 MR. LOGAN: I will move to strike the editorial comment.
19 BY MR. JOHNSON:

20 Q. Tell me what writings are in existence or that
21 you read from Mr. Hubbard that stated his intention to set up
22 a permanent residence either at Gilman Hot Springs or at
23 La Quinta.

24 A. I think there's two parts to that, so let me
25 answer the first part, "in existence." It would be very
26 difficult to find any of such correspondence in existence
27 because of the bent of the organization to destroy such
28 evidence.

1 However, to answer the second part of it, I
2 saw in 1976 correspondence between Mr. Hubbard and Duke Snyder
3 when the purchase of the La Quinta properties was being
4 negotiated by Mr. Snyder, and I saw correspondence even
5 earlier than that which I relayed from Mr. Hubbard to Guardians
6 Office in GO US having to do with their recommendations for
7 what they wanted for a permanent residence for him.

8 Q Can we stop here. You used the words "permanent
9 residence." Now, I understand from your testimony that you
10 saw a document in which the words "permanent residence for
11 Mr. Hubbard" was written, and I'd like you to identify that
12 document so we can look for it.

13 A It was basically that concept, and it may even
14 have used the word "permanent residence." It certainly was
15 the intention of the document to convey that concept. It
16 laid out the fact that a -- a permanent residence had several
17 requirements, and that they were trying to locate a property
18 which would match those requirements.

19 Q Could you identify the document that you said
20 you saw which used the words "permanent residence for
21 Mr. Hubbard." Describe the date of it, who it was from, and
22 to whom it was written.

23 A It was in June of 1976 from Duke Snyder to
24 L. Ron Hubbard.

25 Q And how did you see that document?

26 A I was handling L. Ron Hubbard's communications.

27 Q And what was the nature of that document?

28 A It had to do with laying out the requirements

1 for the residence which would be that --

2 Q Excuse me. May I interrupt you. You said the
3 document used the words "permanent residence." Now you use
4 the word "residence." Which is correct?

5 A Probably used them both, or at least the concept
6 was there.

7 Q I'm not talking about concept. I am now
8 talking about words.

9 I am asking you if you can testify here today
10 and identify a document that used the words "permanent
11 residence for LRH."

12 A I would tell you that out of a hundred thousand
13 documents, I could certainly identify that one.

14 Q And it's your testimony that you read a document
15 in 1976 that today you can recall used the words "permanent
16 residence for LRH"? Is that your testimony?

17 A If it didn't use the words "permanent residence,"
18 then it certainly conveyed that concept, that thought. The
19 concept the Guardians Office was working on was to find a
20 location which was secure enough for Mr. Hubbard that he --
21 that he would not have to continue to flee from all his
22 enemies, and that was what they were working on, and that's
23 the concept of "permanent residence" that was conveyed in the
24 traffic, in the communications, dispatches and telexes from
25 that period.

26 Q I'm having a little difficulty getting you to
27 respond to my questions. My question is: did you see a
28 document that used the words "permanent residence for

1 Mr. Hubbard"? That's a fairly simple, forthright question.
2 Could you answer it.

3 A. I may have.

4 Q. Did you?

5 A. I may have.

6 Q. Do you have a specific recollection that you did
7 see such a document?

8 A. Yep.

9 Q. All right. Describe that document in detail.

10 A. It described --

11 Q. First, by "describing," I mean give me the date
12 of the document, who it was from, when it was sent, and what
13 were the circumstances when you saw it.

14 A. It was the beginning of June 1976.

15 Q. All right.

16 A. It was from Duke Snyder to L. Ron Hubbard.

17 Q. And where were you when you read this document?

18 A. Culver City.

19 Q. Culver City, California. And what was your
20 position in Culver City at the time?

21 A. I was the Deputy LRH External Comm Aide.

22 Q. And you recall specifically reading a document
23 from Duke Snyder to LRH that used the words "permanent
24 residence"; is that right?

25 A. I believe that I saw that. If I didn't see the
26 words "permanent residence," then I certainly saw something
27 which said, you know, "R's long-term residence" or "a
28 permanent location for R," something like that. "It has to

1 have these requirements."

2 Q Mr. Armstrong, what I'm trying to do is to find
3 out what you actually recall having seen and not concepts. I
4 want you to tell me what you actually recall reading on this
5 document from Duke Snyder in early June 1976.

6 A I recall the document's stating the house must
7 be a long way off the road, the house must have a narrow
8 driveway leading up to it, it must be surrounded by trees,
9 it must be inaccessible to the public, it must have a gate
10 which can be guarded, it must have a rear exit for leaving
11 the property.

12 Q You recall all those details. Now, can you tell
13 me under oath that you recall it used the words "permanent
14 residence"?

15 A No.

16 Q When was the last time you saw this document
17 from Duke Snyder?

18 A 1976.

19 Q You have not seen a copy of it or seen it since
20 then?

21 A No.

22 Q And is it likewise true that you cannot recall
23 of your own independent recollection any document that you
24 ever read from or to L. Ron Hubbard which used the words
25 "permanent residence"?

26 A I could not testify with certainty to that fact.
27 I recall the concept and I recall working on the project as if
28 that's what we are doing, getting him a permanent place, but

1 I cannot testify to the explicit use of those two words.

2 Q Now, in your Paragraph 2, you said you were sent
3 on a mission to set up a staging area in Southern California.

4 By whom were you sent on a mission?

5 A Mike Douglas.

6 Q Was this a written order or a verbal order?

7 A Written.

8 Q Is that order still in existence?

9 A I have no idea.

10 Q In your affidavit, you said:

11 "I was sent on a mission to set up
12 a staging area in Southern California for
13 the permanent residence in Southern
14 California."

15 Is it your testimony that the written order from
16 Mike Douglas used the words "permanent residence for L. Ron
17 Hubbard"?

18 A There was a differentiation made between staging
19 area and where we're finally going to locate permanently.
20 The staging area was to be where we are going to be there a
21 couple of months. It's got to be temporary. At the same time,
22 we are going to be working on getting a final, permanent,
23 secure location.

24 The thing was in two parts, and that's the
25 differentiation I am attempting to make, that there was --
26 one was a staging area, and that was Culver City, and one was
27 a permanent location.

28 Q My question was -- and maybe I can recall what I

1 asked rather than having it read back. My question was: did
2 that written order from Mike Douglas use the words "permanent
3 residence in California for L. Ron Hubbard"?

4 A. Possibly "permanent residence," possibly
5 "permanent location," possibly some other use of words which
6 meant permanent and which meant residence, but I don't recall.
7 But the project --

8 Q. Do you actually have a recollection of something
9 you read in 1976 and you can say under oath that it used the
10 words "permanent residence" in there?

11 A. I'm not saying that. I'm saying that was the
12 thought conveyed because it was very obvious to me that there
13 was two parts to this thing. One was the staging area and one
14 was the permanent residence, and it was conveyed to me in
15 person. It was conveyed to me in writing that we were going
16 out to the West Coast and there would be a temporary staging
17 area, and we would be relocating in a permanent location.

18 Q. Well, the words "permanent residence" are your
19 words and not from any document that you read in existence
20 at that time?

21 A. I can't testify to that fact.

22 Q. To what fact?

23 A. That that is not what was used in the dispatches
24 to me.

25 Q. Well, let's turn to the other side of the coin.
26 Can you testify that the words "permanent residence" were
27 used in a dispatch?

28 A. No.

1 Q So is it fair to say that the use of the words
2 "permanent residence" in your affidavit are words that you
3 chose, that you are using to express a concept and not what
4 you read from any dispatch?

5 A Both can be true.

6 Q You are very indefinite on your answers, are
7 you not?

8 A I think I'm being quite definite. I think I
9 explained that I definitely was sent out to Los Angeles on
10 this project, the end result of which was going to be the
11 establishment of either a permanent base or a permanent
12 location or a permanent residence for Mr. Hubbard.

13 Q Well --

14 A I was part of Mr. Hubbard's personal unit. It
15 would have been nuts to think that we were just going to
16 continue on the move or that I was going to come out there
17 and the thing was going to disappear. That's illogic. It
18 was to be permanent. We were all going to be together, and
19 this was permanent.

20 Q Let me ask about the logic. You were on the
21 APOLLO ship, were you?

22 A Uh-huh.

23 Q For how many years?

24 A Five.

25 Q How many different locations did you travel to
26 while on the APOLLO? Could you just outline for me where you
27 traveled.

28 A Did you want the ports?

1 Q Yes, and approximately how long you stayed.

2 A Tangier.

3 Q How long?

4 A A couple weeks.

5 Q All right.

6 A Casablanca, Safi, Agadir.

7 Q Could you give me the times you stayed in each
8 of these ports on the APOLLO, as best you can recall.

9 Casablanca?

10 A Really, this is a five-year period, and we spent--
11 it could have been a day, it could have been two weeks, it
12 could have been a month. Do you want me to do the whole time
13 track? Because it's a tremendous waste of time. Is there a
14 point you want to make?

15 Q All right. Let me make a point. Can I do this?

16 A Yes.

17 Q Isn't it your personal observation that because
18 of real or perceived oppression or opposition by others to the
19 Church of Scientology, the APOLLO had to move frequently around
20 the Mediterranean and the Caribbean? Is that a fair statement?

21 A Real or --

22 Q Real or perceived opposition and oppression
23 to the Church of Scientology.

24 A No.

25 Q Well, why did the APOLLO move to so many
26 different locations?

27 A You should read the wonderful handouts. It's
28 because we all loved the sea life. The APOLLO moved because

1 it was a ship and because it could not stay too long in one
2 port because it became a pain in the ass to the port officials
3 because a berth was not always available, because it was at a
4 lower priority than cargo or passenger vessels; and as a
5 result of that, we had to continue to move so that we do not
6 upset the local populace.

7 Q Well, there seems to be a lot of upsetting
8 the local populace in the various places the APOLLO went to,
9 was there not?

10 A There may have been.

11 Q Well, let me ask you this: did the APOLLO go
12 to Gibraltar?

13 A May have.

14 Q Were you on the APOLLO when it went to Gibraltar?

15 A No.

16 Q What year did you join the APOLLO?

17 A '71.

18 Q Okay. Let me pick up at '71. You don't know
19 anything about the history of the APOLLO being forced out of
20 Gibraltar and being forced out of Corfu, Greece?

21 A No.

22 Q You never heard that?

23 A I heard it. I heard at least Corfu.

24 Q How about Morocco? Was the APOLLO ever in
25 Morocco?

26 A Yes.

27 Q Were you forced out of Morocco?

28 A No.

1 Q You did not understand that the Moroccan
2 authorities compelled the APOLLO to leave Morocco?

3 A No, they didn't.

4 Q Do you know whether or not the APOLLO ever went
5 to Estoril, Portugal, in the southern coast of Portugal?

6 A (Witness shakes his head.)

7 Q You don't recall it being there?

8 A Estoril?

9 Q Yes.

10 A I don't recall that. Is that a county?

11 Q No. It's a section or a city in southern
12 Portugal along the southern border of Portugal on the
13 Atlantic Ocean.

14 A Unh-unh.

15 Q You don't recall that? You never put in any
16 ports in Portugal that you know of?

17 A Yes.

18 Q What ports did you put in?

19 A Funchal, F-u-n-c-h-a-l; Lisboa, L-i-s-b-o-a;
20 and Setubal, S-e-t-u-b-a-l.

21 Q Do you know whether the APOLLO went to the
22 Canary Islands?

23 A Yes.

24 Q Was it forbidden from remaining in the Canary
25 Islands?

26 A I'm not sure.

27 Q It left, though, did it not, very hurriedly?

28 A Yes -- rather what?

1 Q. Hurriedly.

2 A. I think so.

3 Q. Also let's go back to the time you were in
4 Portugal. Do you recall a mob attacking some Scientologists
5 in Portugal?

6 A. I was not there, but I know about that incident.

7 Q. All right. Then didn't you know there was no
8 place in the Mediterranean where the APOLLO could dock and it
9 had to move to the Caribbean? Did you know about that?

10 A. These -- you are making a leap of logic. It was
11 not because there was no place to go. It was simply a choice.

12 Q. Were you on the APOLLO when it went to Barbados?

13 A. Yes.

14 Q. Were Scientologists banned from Barbados?

15 A. I'm sorry?

16 Q. Were the Scientologists forced to leave on the
17 APOLLO from Barbados?

18 A. No.

19 Q. Do you know the circumstances under which the
20 APOLLO left Barbados?

21 A. The APOLLO simply sailed from Barbados.

22 Q. Were you in the APOLLO when it went to Trinidad?

23 A. Yes.

24 Q. You went to Port-of-Spain?

25 A. Yes.

26 Q. Weren't you forced out of Port-of-Spain?

27 A. We were forced out of Trinidad -- I don't know
28 that we were -- that we were docked in Port-of-Spain. No, we,

1 to my recollection, we did not dock at Port-of-Spain, but we
2 were forced out of Trinidad.

3 Q Now, do you recall the APOLLO going to Curacao
4 in the Netherland Indies?

5 A Netherland Antilles.

6 Q Netherland Antilles.

7 A Yes.

8 Q Do you recall being forced out of Curacao?

9 A No, no.

10 Q You don't recall any or do you have any knowledge
11 of any official opposition to the APOLLO, a request by the
12 authorities in Curacao that the APOLLO leave Curacao?

13 A No.

14 Q You know it did leave Curacao, do you not?

15 A Yes.

16 Q My question is -- which I originally asked you --
17 were you not aware of either a belief of persecution or what
18 was perceived to be persecution by Mr. Hubbard against
19 Scientologists everywhere he had been?

20 A Yes.

21 Q And you have testified that after he left
22 Dunedin, you know of four different residences that he had
23 from which he left? "Fled" was the word you used.

24 A Three or four definitely.

25 Q Well, then, isn't it true, Mr. Armstrong, that
26 because of Mr. Hubbard's perceived feeling of being threatened
27 with persecution, that he never stayed in any one place
28 permanently?

1 A. I think that is true of all of us, that we have
2 never stayed in any one place permanently. That's a long time
3 to go, isn't it? But the intention was definitely there.
4 Mr. Hubbard came ashore, after all, and left the shore.

5 Q. Came ashore where?

6 A. He came ashore in 1975.

7 Q. Where? Wasn't that Charleston?

8 A. No.

9 Q. Where did he come ashore?

10 A. He ended up in Daytona Beach.

11 Q. How long did he stay in Daytona Beach?

12 A. A couple of weeks.

13 Q. From there he went to Dunedin?

14 A. Yes.

15 Q. From there he went to Washington?

16 A. Uh-huh.

17 Q. From there he went where?

18 A. To Southern California.

19 Q. Where?

20 A. Culver City.

21 Q. From there he went where?

22 A. La Quinta.

23 Q. From there he went where?

24 A. Hemet.

25 Q. From there he went where?

26 A. I don't know.

27 Q. Prior to going on the APOLLO, do you know where
28 he lived? To help you, have you ever heard of East Grinstead?

1 A. Who?

2 Q Mr. Hubbard. Have you ever heard of East
3 Grinstead?

4 A Your question wasn't clear as to who you were
5 talking about prior to his going on the APOLLO.

6 Q Prior to Mr. Hubbard going aboard the APOLLO, do
7 you know whether he lived in East Grinstead?

8 A Sometime prior to that, yes.

9 Q Have you ever been to East Grinstead?

10 A Yes.

11 Q Was Mr. Hubbard forced out of England?

12 A I believe he chose to go.

13 MR. LOGAN: I trust that if down the road the plaintiffs
14 see some relevancy in this lack of Mr. Hubbard's apparent
15 popularity, that you will respond to discovery on these areas
16 that you have been interrogating this witness.

17 MR. JOHNSON: Well, the reason I'm interrogating this
18 witness on this, Mr. Logan, is that he has stated his
19 conclusions as to permanency of residence. I'm trying to
20 establish what he knows about the history of Mr. Hubbard's
21 frequent moves and lack of permanent residency, and that's
22 the purpose of these questions, to elicit what this gentleman
23 knows so I can test that against his conclusions that
24 Mr. Hubbard was going to suddenly, after all these years of
25 moving, set up a permanent residence. That's the purpose of
26 my questioning, and I would like to proceed if I could on that.

27 MR. LOGAN: Sure.

28 MR. JOHNSON: All right.

1 THE WITNESS: I can respond to that, too.

2 BY MR. JOHNSON:

3 Q All right.

4 A The fact was that was the intention. It was the
5 intention, and that was conveyed to us, that after all these
6 years of moving, Mr. Hubbard wants a permanent residence. This
7 fact -- this fact has been briefed to Guardian Office staffs
8 as late as mid-1981, the fact that they are preventing this
9 man from having his permanent residence.

10 Q Well, my question is: which of the residences
11 you have talked about was it his intent to have as a permanent
12 residence?

13 A The first was in La Quinta.

14 Q That was --

15 A When that fell through and Mr. Hubbard again
16 viewed that his residence had been blown and that the SPs
17 were coming after him, then he decided on another residence,
18 and that was to be in Gilman Hot Springs.

19 Q How far is Gilman Hot Springs from La Quinta?

20 A 40, 50 miles.

21 Q It's in the same area of California, isn't it?

22 A Southern California.

23 Q Perhaps it would be more profitable for us to
24 go back to your affidavit and see what is the basis for your
25 assumptions that you make here.

26 You say that in May of 1976 -- I'm reading from
27 Paragraph 2 -- you drove with three other people whom you name
28 to confer with Duke Snyder. To where did you drive? To

1 Los Angeles?

2 A. Yes.

3 Q. And were you in charge of that group of people?

4 A. Yes.

5 Q. Clarisse Barnett, does she have another name?

6 A. She may.

7 Q. Have you ever heard the name Brousseau?

8 A. Yes.

9 Q. Is Clarisse Barnett and Clarisse Brousseau one
10 and the same person?

11 A. Yes.

12 Q. Was she your junior? Is that your testimony?

13 A. I was in charge of that project to move out to
14 Los Angeles.

15 Q. Was Clarisse Barnett your junior?

16 A. On that project, yes.

17 Q. Jill Goodman was your junior?

18 A. On that project, yes.

19 Q. Gary Reisdorf was your junior?

20 A. Yes.

21 Q. Who sent you on that project?

22 A. Mike Douglas.

23 Q. And who was the CMO at that time?

24 A. Terri Armstrong.

25 Q. That was your wife?

26 A. Yes.

27 Q. Is it not true that she sent you on that mission?

28 A. The orders came from Mike Douglas. Mike Douglas

1 originated the whole thing. Terri was the briefing officer
2 who had us do the required clay demos and brief on our
3 mission orders and fire.

4 Q Well, Terri Gamboa or Terri Armstrong at that
5 time was Mike Douglas's senior, was she not?

6 A No.

7 Q Mike Douglas was senior to her?

8 A No.

9 Q Was Mike Douglas your senior at the time?

10 A Yes.

11 Q And your testimony is that the orders did not
12 come from Terri Armstrong but Mike Douglas; is that your
13 testimony?

14 A Yes.

15 Q And Terri Armstrong had nothing to do with
16 ordering this mission to Los Angeles?

17 A Terri Armstrong was the briefing officer. She
18 knew about it. She was aware of it. Her personnel were used
19 to carry this out.

20 Q Were you saying that Mike Douglas was in Dunedin
21 at the time you were ordered to Los Angeles?

22 A No.

23 Q Well, where was Mike Douglas located at the time
24 you were ordered to Los Angeles?

25 A Washington, D.C.

26 Q Well, who was your senior in Dunedin at the
27 time?

28 A I suppose Ken Urquhart.

1 Q Did Ken have anything to do with your mission
2 to Los Angeles?

3 A No.

4 Q So the time you went to Los Angeles, were you
5 aware of any occasion in which L. Ron Hubbard had previously
6 had a permanent residence?

7 A At the time I left?

8 Q Yes.

9 A You are not asking me about my knowledge at
10 this time of his various permanent residences?

11 Q I'm asking you at that time.

12 A At that time what did I have knowledge of?

13 Q Yes.

14 A I had knowledge of the ship; I had knowledge
15 of Rhodesia; I had knowledge of England. That is about what I
16 knew.

17 Q And was your understanding that each of those
18 places -- Rhodesia, the APOLLO, and East Grinstead in
19 England -- were all permanent residences of L. Ron Hubbard?

20 A I did not even -- I had never thought of
21 L. Ron Hubbard's permanent residences up to that time. I was
22 aware of the desire on the part of the organization to have
23 it possible for him to have a permanent residence, and I became
24 aware of his desire to have a permanent residence when I was
25 briefed to do that mission.

26 Q Who told you that?

27 A Michael Douglas.

28 Q And Michael Douglas used the words "permanent

1 residence for L. Ron Hubbard"?

2 A. Either used the words "permanent residence" or
3 words which approximate that which are really close to it.
4 It may have been, you know, "permanent location."

5 Q. Well, here again, the words "permanent residence"
6 that you are using throughout the affidavit are your words, not
7 what was told to you by someone else?

8 A. That's the concept. I don't know how to better
9 state it. It differentiates between a temporary location and
10 a permanent location. It differentiates between the -- which
11 things had been where he was in Washington, D.C., and it was --
12 "This is temporary until we get a permanent place." That's
13 the concept that was conveyed.

14 Q. Let me ask you in how many orgs or missions or
15 other entities of the Church does L. Ron Hubbard have a
16 permanent office?

17 A. A permanent office?

18 Q. Yes. A permanent office assigned for his use.

19 A. How many organizations does he have --

20 Q. How many locations throughout the world is there
21 a permanent office assigned to L. Ron Hubbard on the
22 Scientology premises?

23 A. I have no idea.

24 Q. Let's start with East Grinstead. Have you ever
25 seen a permanent office for L. Ron Hubbard there assigned for
26 his permanent use?

27 A. Never seen it.

28 Q. Were you in the Manor House at East Grinstead?

1 A Yes.

2 Q And you have never seen an office which is
3 designated as L. Ron Hubbard's office there?

4 A If I did, it wasn't -- it wasn't set up like that.
5 I -- I was there in -- I worked in an office which held
6 L. Ron Hubbard's library.

7 Q Were you ever in the Flag facility in Clearwater
8 at Fort Harrison? Have you ever seen a permanent office
9 assigned there?

10 A In Fort Harrison?

11 Q Yes.

12 A No, sir.

13 Q Have you been to Fort Harrison?

14 A Yes.

15 Q And you never saw a permanent office set up for
16 L. Ron Hubbard?

17 A Not at Fort Harrison.

18 Q Your testimony is you have never been anywhere
19 where there was an office assigned for L. Ron Hubbard?

20 A No.

21 Q Have you ever been to the facility --

22 A Did you understand my answer?

23 Q I thought I did. I perhaps looked questioningly
24 at your answer.

25 A That was not my testimony, then; let me put it
26 that way.

27 Q Let me hear your testimony.

28 A My testimony is that I understand that it is the

1 policy to have an office designated in every org in the world
2 as an L. Ron Hubbard's office. Okay? I have been in some
3 such offices. I was never in the offices which I knew to be
4 ceremonial L. Ron Hubbard offices in either of those locations
5 which you mentioned, that is, at Fort Harrison and the Manor
6 at St. Hill.

7 (Off the record.)

8 BY MR. JOHNSON:

9 Q Was your purpose of being sent on the mission
10 to Los Angeles to set up a Comm Relay Unit for Mr. Hubbard
11 in Los Angeles?

12 A Yes.

13 Q Turning to Paragraph 3 of your affidavit, you
14 use the words "permanent residence" concerning what you said
15 you learned from Mr. Snyder. Did Mr. Snyder in either written
16 or verbal communication with you use the term "permanent
17 residence for Mr. Hubbard"?

18 A Either those words or something very similar.

19 Q Well, here again, Mr. Armstrong --

20 A A permanent location, maybe. That sort of an
21 idea. There was a differentiation made between the staging
22 area and what was to finally be a residence where Mr. Hubbard
23 could have all his things; he could have a home; that's where
24 he would reside. There was a definite distinction made. The
25 staging area was not it.

26 Q Well, my question is: did Mr. Snyder either in
27 written or verbal communications to you ever use the words
28 "permanent residence"?

1 A. He may have.

2 Q. Do you have a recollection that he did?

3 I can see you shake your head.

4 A. I'm not shaking my head.

5 MR. LOGAN: How do you know he shook it?

6 MR. JOHNSON: I could see it, but the record can't.

7 You are correct, as usual. I saw him shake his head negatively.

8 The record cannot see it.

9 Would you please read the question back to him.

10 THE WITNESS: I don't know. I can't answer and say I
11 saw those words or I heard those exact words. Generally in
12 Scientology we talked about locations. It would be at a
13 location rather than a residence, but that's the concept.
14 It's where he intended to live as a permanent place. He had
15 not had a permanent place up to that time.

16 BY MR. JOHNSON:

17 Q. So what you are telling me, then, even the
18 word "residence" was not used in Scientology and the word
19 "location" may have been used? Is that what you are telling me?

20 A. I'm saying that if he didn't use the word
21 "residence," he used the word "location."

22 Q. But did he ever use the words "permanent
23 residence"?

24 A. He may have.

25 Q. Here again, we're back where we started from.

26 But you cannot recall that he did? You don't
27 recall one way or the other?

28 A. No. I recall the concept. I recall us talking

1 about it. I recall seeing written communications about it. I
2 don't recall those exact words.

3 Q Okay. From 1976 up until the time you met with
4 Mr. Flynn in 1982 and offered to give him this affidavit, had
5 you had any occasion to discuss this subject of LRH's residence?

6 A Many times.

7 Q What were those occasions?

8 A Generally in terms of how awful it was that the
9 SPs or the government officials were making it not possible
10 for Mr. Hubbard to live at his home, at his residence.
11 Mr. Hubbard wants to live here. He's not able to do that
12 because somebody is going to come up and serve him papers, and
13 it was well known.

14 I attended a briefing of the Guardians Office
15 staff in mid-1981 in which this exact concept was conveyed to
16 them by Laurel Sullivan, LRH's Personal Public Relations Officer,
17 on how --

18 Q At his residence? What residence?

19 A Gilman Hot Springs at that time.

20 Q And this was in 1981?

21 A Yeah.

22 Q Miss Sullivan told you that Mr. Hubbard wanted
23 to live at Gilman Hot Springs?

24 A Well, I knew Mr. Hubbard wanted to live in
25 Gilman Hot Springs. I carried out renovations on his house,
26 and I received many orders directly from Mr. Hubbard. However,
27 I am saying that it went forward as late as 1981, and it was
28 discussed many times in the context of Mr. Hubbard being denied

1 his residence, you know. The Guardians Office got themselves
2 in hot water by allowing themselves to be penetrated by the
3 FBI; and as a result of that, Mr. Hubbard is now hunted and
4 not allowed to live in his home, his residence.

5 Q When did he leave Gilman Hot Springs?

6 A I don't think he ever went there -- he went
7 there, but he never lived there.

8 Q Let's go --

9 A It was his residence.

10 Q Well, isn't it true that Mr. Hubbard never lived
11 at Gilman Hot Springs?

12 A It was his residence. The only reason he didn't
13 was because he was in another staging area five miles away in
14 Hemet, waiting for things to cool down so he could live at his
15 residence.

16 Q Do you know as a matter of truth and fact that
17 Mr. Hubbard never lived at Gilman Hot Springs?

18 A That's true.

19 Q Let's go to Paragraph 4.

20 A To begin with, that's probably a typo where the
21 word "arrive" lacks a "d."

22 Q Yes. Now, you state in Paragraph 4 that Mary Sue
23 Hubbard arrive at Astra. What do you mean by "Astra"? And
24 I'll insert the "d." You intended to say "arrived," did you
25 not?

26 A I state what Astra was in the preceding paragraph:
27 "... to the Culver City location which was code-named by the
28 GO and Mr. Hubbard's personal staff as Astra."

1 Q. Describe the Culver City location.

2 A. It -- Culver City, it was an apartment complex.
3 It was off of Overland Drive. It was a big apartment complex,
4 and we had three apartment suites or units.

5 Q. You stated that Mary Sue Hubbard set up a
6 residence there. What do you mean by she "set up a residence"?

7 A. That's where she was residing; she had her
8 personal staff; she had an office; she began operating from
9 there; she had daily telex and written communications; she
10 slept there; she ate there; she had her cook there; she had
11 her personal staff there; she resided there.

12 Q. How do you define the word "residence"?

13 A. A place where one resides.

14 Q. Well, I don't think you can define a word by
15 using the same word in the definition, can you?

16 A. I don't know. A location where ...

17 Q. I guess I want to know what you meant in your
18 affidavit in Paragraph 4 where you said: "Mary Sue Hubbard
19 set up residence." What do you mean by that?

20 A. Well, as opposed to she visited, and that was it.
21 As opposed to what was not a hotel room. She had her cook
22 cooking in the place. She was not eating out and hanging her
23 hat there.

24 Q. Who owned the Culver City property?

25 A. I have no idea.

26 Q. Who owned the property at La Quinta?

27 A. I was told that the organization bought the
28 La Quinta properties, and I'm not sure. My understanding was

1 that Mr. Hubbard bought one of the properties, but perhaps it
2 was bought by the organization.

3 Q. Your answer is you don't know who owned it; is
4 that correct?

5 A. No.

6 Q. "No" means you do not know who owns it?

7 A. Right.

8 Q. All right. Let's turn to Paragraph 5. You state
9 that in late 1976 Mr. Hubbard moved from Astra to the
10 La Quinta property and lived there until 1979. Do you know
11 that of your own personal knowledge?

12 A. I know the latter part, but I don't know the
13 former part. I didn't see him until 1977.

14 Q. So, then, it's hearsay that you say he moved in
15 1976; is that correct?

16 A. Well, this is what I was told. I saw lots of
17 documents to that effect. I know people who moved with him at
18 that time and set the location up. I know that it was
19 purchased at that time, and I was told that he moved. He may
20 not have, but I'm saying this is --

21 Q. You are talking about hearsay. You don't know
22 of your own personal knowledge that he stayed there from 1976
23 until 1979, do you?

24 A. I saw him there in 1977. I know he left there
25 in 1977 because I saw the dispatches in which he fled to
26 Sparks, Nevada. I saw evidence that he was there in 1976. I
27 saw communications from him dated 1976 indicating that he was
28 on the property at that time.

1 So other than those things, I -- I was not there
2 in 1976 and I did not see Mr. Hubbard at the property in 1976.

3 Q. Now, does the dateline of the communications --
4 is that, in your opinion, proof that he was at that location
5 where the communications were datelined?

6 A. Unless they are back-dating and back-concepting.

7 Q. Have you ever known any occasion in which a
8 communication was datelined at a particular location and he
9 was not at that location?

10 A. Oh, possibly.

11 Q. You said that in early June of 1976, in
12 Paragraph 4, that Mrs. Hubbard moved in. Where were you in
13 June of 1976?

14 A. I was locked up in the Manor, Fifield Manor in
15 Los Angeles.

16 Q. So, then, you were not at Astra or Culver City
17 at that time?

18 A. No, I was at Astra in June '76.

19 Q. Well --

20 A. Partway through June, L. Ron Hubbard ordered me
21 locked up in the Manor, and I continued there imprisoned for
22 about three weeks, and then I was shipped off to Clearwater.

23 Q. And you say imprisoned in Fifield Manor in the
24 City of Los Angeles for three weeks in June of 1976, and from
25 there you went to Clearwater?

26 A. Yeah.

27 Q. How long were you in Clearwater?

28 A. 17 months.

1 Q So, then, what I'm trying to learn, Mr. Armstrong,
2 is what you know of your own knowledge. When you state in
3 your affidavit that in June of 1976 and continuing until '79,
4 Mr. and Mrs. Hubbard were staying in either Culver City or
5 La Quinta, you were either in jail, as you put it, or locked
6 up at Fifield Manor or in Clearwater, Florida? You were not
7 there to observe it; is that correct?

8 A That's correct.

9 Q Now, you mentioned in your Paragraph 5 that
10 there were three adjacent properties in La Quinta purchased
11 for Mr. Hubbard, his family, and staff. What is your knowledge
12 of that? Did you have anything to do with the purchasing of
13 the properties?

14 A Nope.

15 Q Did you see the deeds?

16 A No.

17 Q Do you know in whose name or what entity's name
18 the titles of the said properties were listed?

19 A I was told they were in the name of Norton Karno.

20 Q And who told you that?

21 A We were -- I was briefed on a shore story upon
22 arrival in La Quinta --

23 Q By whom?

24 A -- in December of 1976.

25 Q By whom?

26 A Rich Cohen, Carol Spurlock. It was a standard
27 briefing and drill which one had to do.

28 Q My question is: do you know of your own personal

1 knowledge of the title to the property?

2 A. You asked me initially -- you asked me who briefed
3 me, and I'm telling you those were the people who briefed me,
4 and I was given a mimeographed briefing sheet which laid out
5 that if anyone asks you who owns the properties, it's Norton
6 Karno. "And who are all these people?"

7 "You are all friends of Norton Karno."

8 Q. Did Norton Karno own the property?

9 A. I doubt it.

10 Q. Well, do you know who owned the property? We're
11 talking about what you know of your own personal knowledge
12 or any documents you saw, not what you doubt or what you believe.

13 A. Then I don't know.

14 Q. All right. Now, you state in that same
15 Paragraph 5 that the Olives' property was originally designated
16 as Mr. Hubbard's residence, but he did not like it and chose
17 the Rifle's property as his and his wife's property.

18 Now, is it my understanding from your prior
19 testimony that you were either locked up in Fifield Manor or
20 in Clearwater during the time that this is alleged to have
21 occurred?

22 A. Yes.

23 Q. Did you have any conversation with Mr. Hubbard
24 in which he told you he did not like the Olives' property?

25 A. Yes.

26 Q. And when was that conversation?

27 A. That would have been in 1978.

28 Q. What was the occasion of your conversation with

1 him?

2 A. Mr. Hubbard was at the Olives' property and he
3 was going over with Bill Robertson some changes that he wanted
4 done to the house.

5 Q. And what house was he referring to?

6 A. The Olives' property.

7 Q. What did he say to you about the Rifle property
8 or Reuffel Ranch?

9 A. In the communication -- I was there, Bill
10 Robertson was there, Mr. Hubbard was there -- Bill Robertson
11 mentioned that he understood that where we were, the Olives'
12 building, was actually what Mr. Hubbard had chosen but that
13 for some reason he had decided to live in the Rifle property.

14 Q. Isn't it true that the Rifle was actually a
15 workplace rather than a residence? He had offices in the
16 Rifle property?

17 A. I don't understand what you mean by that.

18 Q. Well, you had been at the Rifle property, of
19 course, had you not?

20 A. Yes.

21 Q. And it's primarily a workplace rather than a
22 place to live, was it not?

23 A. No.

24 Q. Were there offices in the Rifle property?

25 A. Yes. There were offices in all the properties.
26 Rifle had less than any of them.

27 Q. Didn't Mr. Hubbard have an office in the Rifle
28 property?

1 A. Yes.

2 Q. Did he have an office in the Olive property?

3 A. No.

4 Q. Did any of his staff have offices in the Rifle
5 property?

6 A. There was a CMO office there and at Olive.

7 Q. What further conversation did you have with
8 Mr. Hubbard about either the Olive or the Rifle property?

9 A. I think -- I'm not sure. That's all I can recall
10 for now.

11 Q. All right, sir.

12 Isn't it true, Mr. Armstrong, that Mr. Hubbard
13 never told you that he chose the Rifle property as his and his
14 wife's residence?

15 A. What was that? Is it true?

16 Q. Isn't it true that Mr. Hubbard never told you,
17 as you have alleged here, that he chose the Rifle property
18 as his and his wife's residence?

19 A. He said something to that effect.

20 Q. What did he say?

21 A. He laid out the complaints that he had with him
22 and the modifications he wanted done and the fact that that's
23 why he chose Rifle.

24 There was -- there were dispatches on the
25 subject, and other people who were there at that time when he
26 originally was supposed to move into the property informed me
27 that was -- that's what happened.

28 Q. Well, when you talk about La Quinta in your

1 testimony, you are including, are you, the Olive and the Rifle
2 property as a part of La Quinta; is that correct? How about
3 the Palms? Are you including Palms, Rifle, and Olive as part
4 of La Quinta?

5 A. Let me clarify it. During what we call the
6 La Quinta period in the time track of Scientology or the time
7 track of L. Ron Hubbard, there are a number of properties
8 involved. There's one called Monroe; there's one called
9 Silver; there's one called Palm; there's one called Olives,
10 one called Rifle. All of them, I believe, have separate deeds.
11 They are all separate properties. As far as L. Ron Hubbard's
12 residence at La Quinta, it was Rifle. As far as where I was
13 in the RPF at La Quinta, it was Monroe. As far as where I was
14 as a guard on duty, I was a guard at Rifle and a guard at
15 Silver.

16 So there's a lot of properties involved, and the
17 term "La Quinta" is pretty broad and covers a number of years.

18 Q. Well, during much of the time of what you are
19 giving in your affidavit concerning Astra and La Quinta, you
20 were either locked up in the RPF or you were on post in
21 Clearwater; is that not correct?

22 A. I was either locked up in the RPF or on post
23 in Clearwater during -- from the end of June 1976 through
24 December 1977.

25 Q. After 1977, were you ever in the RPF?

26 A. Yep.

27 Q. And when was that, sir?

28 A. That was in fall of 1978.

1 Q And how long were you in the RPF in the fall of
2 1978?

3 A Eight months.

4 Q From what month until what month?

5 A Oh, I guess from August through April maybe.

6 Q From August of 1978 through April of 1979?

7 A Uh-huh.

8 Q And where were you assigned to the RPF?

9 A The RPF berthed at a place called Monroe.

10 Q And where is that in relationship to La Quinta?

11 A It was about five miles from the Rifle property.

12 Q What were your duties when you were in the RPF
13 from August of '78 to April of '79?

14 A Worked.

15 Q You say "worked." Like work with your hands?

16 A Yeah.

17 Q What kind of work did you do?

18 A I laid sidewalk, brick sidewalk; I tiled floors
19 in L. Ron Hubbard's house; I ripped out the insulation and
20 re-insulated his house; I cleaned his house; I worked on the
21 recarpeting of his house; I painted his house; I worked on the
22 air-handling units in his house.

23 Q I take it you were not handling any communication
24 lines at that time?

25 A I handled the RPF communication lines.

26 Q You did not handle L. Ron Hubbard's communication
27 lines?

28 A No.

1 Q During the time you did these works in
2 Mr. Hubbard's house, as you have described it, he was not
3 present and living there, was he?

4 A He moved out because he was allergic to the
5 fiberglass insulation which was in the building, and he moved
6 back in once we had taken out the floor and tiled the floor
7 in his bedroom and in his office spaces, and we carpeted the
8 building and had gotten rid of all the fiberglass and painted
9 the house and re-insulated everything.

10 Q When did he move back in?

11 A That would have been December of '78 --
12 seven- -- yeah, I guess '78.

13 Q You were in the RPF in December 1978, were you
14 not?

15 A Uh-huh.

16 Q And in December 1978, you were not working in
17 La Quinta, were you?

18 A I worked in his house.

19 Q But when he moved back in, you were not working
20 at La Quinta; you were back in Monroe?

21 A We slept at Monroe. We came over every day by
22 bus to the La Quinta property and worked at the La Quinta
23 property.

24 Q When he moved back in, did you come over to the
25 La Quinta property?

26 A Yes.

27 Q And what did you do when he moved back in?

28 A We went through his things which were in storage,

1 cleaned them, inventoried them, reboxed them, put them back in
2 storage.

3 Q What type of things were in storage?

4 A Oh, his personal furniture, his boxes of --
5 all sorts of things -- correspondence, books -- tons of books --
6 sheets, coats, clothing, appliances, silverware, chairs,
7 tables.

8 Q You state in Paragraph 6 that Mr. Hubbard in
9 August of '77 to December of 1977 was in Sparks, Nevada. Where
10 were you during that period of time?

11 A I was in the RPF.

12 Q Where?

13 A Clearwater.

14 Q Did you have any communication with Mr. Hubbard
15 from August 1977 to December 1977?

16 A I don't believe so.

17 Q You state in your initial part of Paragraph 6
18 about certain thought processes Mr. Hubbard had. What was the
19 basis of that statement in your affidavit?

20 A It was communications from Laurel Sullivan; it
21 was the reading of his correspondence from Sparks, Nevada;
22 it was interviews which were done of the messengers who were
23 with him at that time -- that sort of thing.

24 Q Well, what I'm trying to ascertain is if you
25 were in the RPF from June 1976 to December 1977, how did you
26 have access to these documents you are talking about?

27 A I mentioned at the bottom that I have personally
28 seen letters from Mr. Hubbard during this period to persons at

1 the La Quinta property stating that he would be returning to
2 his home in La Quinta as soon as it was safe to do so and
3 issuing orders specifically to do with the establishing and
4 training of film -- a film crew at La Quinta while he was away.

5 Q How did you have occasion to see letters when
6 you were in the RPF down in Clearwater?

7 A I subsequently saw those letters.

8 Q You say in your affidavit during this period
9 from August '77 to December '77, indicating in your affidavit
10 that during the period from August to December you saw letters.
11 Did I misinterpret your affidavit; you did not mean to say that?

12 A I think you did misinterpret it. "I have
13 personally seen letters from Mr. Hubbard during this period
14 to persons at the La Quinta properties." Mr. Hubbard was in
15 Sparks. He wrote to persons on the properties "during that
16 period stating that he would be returning to his home in
17 La Quinta as soon as it was safe to do so and issuing orders
18 specifically to do with establishing and training a film crew
19 at La Quinta while he was away."

20 So during this period -- now, there's every
21 possibility that somebody for a joke got the idea of back-
22 dating documents and making them appear as if L. Ron Hubbard
23 was in Nevada and, you know -- but it seems highly unlikely,
24 and I saw correspondence from him during that period to people
25 on the property.

26 Q When you say "during that period" -- when did you
27 see the correspondence? Let's put it this way.

28 A Okay. When I was in charge of the LRH Archives.

1 Q All right. But during the time you allege in
2 your affidavit that he was in Sparks, Nevada, you had no
3 contact with him or his staff because you were locked up in
4 the RPF; is that correct?

5 A That's correct.

6 Q So what you are saying in your affidavit is that
7 you have in the last year or so seen something which indicates
8 to you that back in 1977 he was at Sparks? That's what you
9 are saying in your affidavit?

10 A I have listened to interview tapes of his
11 messengers who talked about this incident, about his living
12 in Sparks, about the period of time involved, about why he
13 left, and when he came back.

14 Q Have you ever discussed with Mr. Hubbard about
15 whether or not he was in Sparks, Nevada?

16 A No.

17 Q Now, when you use the words in Paragraph 6
18 "temporarily fled," what's the source of that?

19 A I was told by Laurel Sullivan and by these
20 messengers --

21 Q Who?

22 A Diane Voegeding, Gale Irwin.

23 Q So what you have written here is based upon what
24 someone has told you; is that what you are saying?

25 A And by my observation of documents to that
26 effect. Mr. Hubbard talked about coming back when it was safe
27 to do so.

28 Q Where are the documents that you refer to that

1 you have since read?

2 A. In archives.

3 Q. Do you have copies of them?

4 A. No.

5 Q. Are copies on file in the Superior Court in Los
6 Angeles?

7 A. Some may be.

8 Q. Specifically, can you recall the letters that
9 you are referring to in your affidavit that you have read?
10 Can you give me the dates the letters were written and by whom
11 they were written?

12 A. There were dispatches which I saw when I first
13 got into the film crew.

14 Q. When was that?

15 A. It was in 1977. December '77. And they were
16 in materials in the film archives. Then there were materials
17 that were in L. Ron Hubbard's personal archives, and these had
18 to do with contacting Boudin and they had to do with setting
19 up a film crew, and there were the tapes of interviews done
20 with Diana Voegeding, Gale Irwin, Leo Johnson.

21 Q. In your affidavit in Paragraph 1 in which you
22 say Mr. Hubbard fled from Florida, you don't use any
23 modifying word to "fled," whereas in Paragraph 6, you describe
24 Mr. Hubbard as "temporarily fleeing." What do you mean by
25 "temporarily fleeing"?

26 A. Well, he came back there. He didn't go back to
27 Dunedin.

28 Q. And what do you mean by the word "fled"?

1 A. Again, when the -- this was occasioned by the
2 fear that he might be indicted in the criminal action brought
3 by the government against the hierarchy of the Guardians
4 Office, and this was as it was described to me by Laurel
5 Sullivan, Diana Voegeding, Gale Irwin.

6 Q. So you are basing your affidavit on what those
7 people told you?

8 A. And on the fact that I knew he was in Sparks
9 until it was determined that he would not be indicted.

10 Q. When you say because he feared he might be
11 implicated, have you ever talked to Mr. Hubbard in which he
12 relayed to you his fears about being indicted?

13 A. No.

14 Q. What documents do you have to support your
15 allegations here that Mr. Hubbard feared that he might be
16 implicated or indicted?

17 A. I don't have any.

18 Q. And what documents have you read that would
19 support your allegations that he feared he might be implicated?

20 A. Correspondence to messengers having to do with
21 the case, correspondence --

22 Q. Tell me about the correspondence. Let's
23 describe each of the pieces of correspondence in which L. Ron
24 Hubbard stated that he might be indicted.

25 A. He issued legal orders having to do with how to
26 go about fighting this --

27 Q. I'm not talking about --

28 A. -- the eventuality of indictment.

1 Q What legal orders did he issue you?

2 A They had to do with strategies to be worked on,
3 and I don't recall the strategy right now. Perhaps I didn't
4 understand it at the time because it didn't make sense to me,
5 but there was a strategy, and there was also -- there was
6 communications about getting the organization to fund the --
7 pay for the legal fees rather than himself.

8 Q Your statement that Mr. Hubbard left and went
9 to Sparks is your conclusion, which is not based upon any
10 documents or any conversation with Mr. Hubbard; is that
11 correct?

12 A It's based solely on correspondence read after
13 the fact and interviews done with his messengers, one of whom
14 accompanied him and lived with him in Sparks.

15 Q Can you explain to me, then, if he was indicted,
16 why would it make any difference whether he is in Sparks or
17 if he is in La Quinta?

18 (Off the record.)

19 (The record was read by the reporter.)

20 THE WITNESS: He wasn't indicted.

21 BY MR. JOHNSON:

22 Q But you state there that he fled to Sparks
23 because of a fear that he might be indicted. Isn't that a
24 non sequitur?

25 A He feared that he might be implicated in the
26 Guardians Office operations and therefore indicted. Well, I
27 think it's similar to the situation now. He has again fled
28 and apparently if he's alive, he's in hiding, and a similar

1 situation exists.

2 Mr. Hubbard -- I think that in his mind this
3 would be very logical. If he felt that he was going to be
4 implicated and that they were going to call him as a witness,
5 then it's something that I don't think that he could bear, and
6 he left the area. When he determined that would not happen,
7 then he returned. So to me --

8 Q Well, Mrs. Hubbard did not flee, did she?

9 A No.

10 Q Wasn't she indicted?

11 A Yeah.

12 Q Didn't she fear that she might be indicted?

13 A Mrs. Hubbard is not Mr. Hubbard.

14 Q What I'm trying to find out: what's the real
15 basis of your conclusion here that Mr. Hubbard fled because
16 he thought that he was going to be indicted? Is that just a
17 conclusion of yours?

18 A Well, it isn't a conclusion of mine. It is
19 what I have been told by his messengers who were with him at
20 the time.

21 Q And the messengers you are talking about are
22 the ones named in your affidavit -- Broeker, Roussouw, and
23 Voegeding?

24 A Diana Voegeding and her sister, Gale Irwin.

25 Q They are the ones upon which you are basing
26 your statement here?

27 A That and in talking to Laurel Sullivan, who was
28 there, and in talking to other people who were on the property

1 at that time, and in viewing the documents which I have
2 mentioned.

3 Q But you mentioned documents of Boudin. Are you
4 talking about letters he wrote to his lawyer Mr. Boudin from
5 New York? Did you read the letters between the attorney and
6 client? Is that what you are telling me?

7 MR. LOGAN: I object to the form of the question. It
8 presupposes facts not in evidence, specifically, the attorney-
9 client relationship of L. Ron Hubbard and Leonard Boudin.

10 BY MR. JOHNSON:

11 Q Didn't you tell me that he was writing to his
12 attorney Leonard Boudin, that you read those letters?

13 A No. These were communications which were given
14 to people who were to communicate to Boudin to get Boudin to
15 go out to the property, and they were communications to
16 messengers, and they were communications from L. Ron Hubbard
17 to Mary Sue Hubbard. They were in L. Ron Hubbard's archives,
18 which I was responsible for.

19 Q But in reading the archives, you were reading
20 letters between Mr. Hubbard and Mr. Boudin pertaining to
21 legal advice given or asked?

22 A No.

23 Q Did you read any communications from L. Ron
24 Hubbard to the attorney, Leonard Boudin?

25 A There may have been, but I believe that the
26 communications were all given to somebody else to give to
27 Boudin. Regardless of that, they were in L. Ron Hubbard's
28 archives, which I was responsible for.

1 Q Now, you stated in your affidavit he lived in
2 hiding in Sparks, Nevada. Here again, this was a time you were
3 in the RPF; is that correct?

4 A Yep.

5 Q Have you ever been to Sparks, Nevada?

6 A No.

7 Q Tell me about what you did in the RPF while you
8 were in Clearwater.

9 A I worked.

10 Q What kind of work?

11 A Manual work.

12 Q Can you describe it.

13 A Oh, I scraped sidewalks, I swept, I washed walls,
14 I cleaned things and built things, I -- that sort of thing.

15 Q Here again, during this period of time, you were
16 not handling any communications for L. Ron Hubbard?

17 A No.

18 Q So is it fair to say that your Paragraph 6 in
19 your affidavit is based upon what you testified now are
20 conversations with other people and letters that you have read
21 recently from LRH archives?

22 MR. LOGAN: Could you define "recently."

23 MR. JOHNSON: Well, let me ask him.

24 Q How recently did you read them?

25 A 1981.

26 Q 1981?

27 A Okay.

28 Q Is that a fair statement of your basis for your

1 Paragraph 6?

2 A. Yeah.

3 Q If these letters are still in the archives,
4 could you identify them specifically so I may seek to view them?

5 A. Uh-huh.

6 Q Please do so. Describe them so I may know what
7 to ask for.

8 A. They are from a period of 1977. A lot of them
9 were written by Pat Broeker; a lot of them are typed by
10 L. Ron Hubbard.

11 Q How do you know they were typed by him?

12 A. Maybe they weren't. They sure looked like the
13 way he types things.

14 Q Did it contain a written signature in handwriting?

15 A. There may have been LRs. It was correspondence
16 between him and Mary Sue.

17 Q What else? What did he say in the correspondence
18 between him and his wife concerning his being away from
19 La Quinta?

20 A. It was talking about when he would be able to
21 get back and --

22 Q And what did he say in that respect? And, also,
23 in the letters you were referring to, were they filed with the
24 Superior Court here in Los Angeles, or copies thereof?

25 A. Some of them may be.

26 Q But you know what's filed with the Superior
27 Court in Los Angeles, do you not?

28 A. Not in detail.

1 Q Weren't these letters which you had in your
2 possession prior to being turned over to the court?

3 A I don't think all of them.

4 Q Did some of them come from Mr. Flynn?

5 A Huh?

6 Q Did some of them come from Mr. Flynn?

7 A None, to my knowledge.

8 Q Well, how can we determine, in order to
9 corroborate your testimony here, whether the letters that you
10 say you read which support your Paragraph 6 actually exist?

11 A I could find them in archives.

12 Q Well, how many of the letters from the archives
13 did you take?

14 A I never took any of them.

15 Q You never had in your possession any letters
16 from the archives?

17 A I delivered the letters, correspondence, copies
18 to Omar Garrison. So that was while I was in archives I
19 delivered those things.

20 Q And how did they get from Omar Garrison into the
21 court?

22 A I was working with Omar Garrison. He gave -- I
23 was sorting out documents. I was -- continued to work for him
24 after the organization had cut communication lines with him;
25 and when they came after me, I shipped off this stuff.

26 Q To whom?

27 A Flynn.

28 Q So, then, all the letters that you say that will

1 support your testimony here, you turned over to Mr. Flynn?

2 A. No --

3 Q. What ones did you not turn over to Mr. Flynn?

4 A. The vast majority of the documents, and
5 particularly original documents, are still with archives.

6 Q. So when you prepared this affidavit, you did not
7 have any letters or copies of letters with which to check to
8 determine the accuracy of your affidavit here?

9 A. No.

10 Q. In Paragraph 7, you say that while Mr. Hubbard
11 was in Sparks, Mrs. Hubbard resided at the Rifle property in
12 La Quinta. Here, again, you were in the RPF in Clearwater at
13 this time, were you not?

14 A. Yes.

15 Q. And when Mrs. Hubbard, you have alleged, left
16 Rifle to take up residence in Los Angeles and Mr. Hubbard
17 moved back to Rifle from Nevada, where were you?

18 A. I was at La Quinta.

19 Q. When did you arrive at La Quinta?

20 A. The end of December 1977.

21 Q. And then in August of 1978 through April of '79
22 you then went back into the RPF?

23 A. Yep.

24 Q. In Paragraph 8, in the last sentence, you allege
25 that guards were doubled because of fear by Mr. Hubbard that
26 Mrs. Hubbard might be tailed by federal agents to La Quinta.
27 What's the source of that statement?

28 A. Orders.

1 Q From whom?

2 A Mr. Hubbard.

3 Q In what form were the orders?

4 A They came via his messengers.

5 Q And what was the order? A written order?

6 A No.

7 Q Did you ever talk to Mr. Hubbard about this
8 subject?

9 A No.

10 Q So the basis of your statement in the last
11 sentence of Paragraph 8 is that someone told you that this was
12 Mr. Hubbard's thinking?

13 A It came down as an order from Source.

14 Q Who told you this verbal order?

15 A I think it was Wayne Marple.

16 Q And what did he tell you?

17 A "The 'Lady's' on the property; double the
18 guards." This was the code name for Mary Sue. They never
19 said the names. This was the "Lady," and he was the "Boss."

20 Q That was the extent of what Mr. Marple told you
21 on which you base this last sentence of Paragraph 8?

22 A No. It came from the CMO, and it was
23 Mr. Hubbard's order.

24 Q You just explained to me it was Mr. Hubbard's
25 order delivered to you by Mr. Marple --

26 A That was the original -- the first time I ever
27 heard of it, when she first arrived on the property.

28 Q Have you told me all that Mr. Marple told you

1 about the order?

2 A He said that it came from the Boss.

3 Q And what specifically did he -- Mr. Marple --
4 tell you which is the basis for your last sentence here in
5 Paragraph 8?

6 A This thing was -- it was a new concept to me
7 that -- you know, "What's going on? Somebody's already on
8 guard duty."

9 "Well, the order came down from the Boss. The
10 Lady is on the property. Double the guard."

11 Q You stated a fear that Mr. Hubbard had. What
12 was the basis for that statement?

13 A Well, that was part of it.

14 Q That's your assumption?

15 A Well, it's what we were all briefed on.

16 Q Did Mr. Marple tell you that he feared that?

17 A Before you became a guard, you were briefed on
18 being a guard, and everyone was instructed of the possibility
19 that the FBI could come, somebody could come to serve papers.
20 We were instructed how to not accept papers. We were
21 instructed to deny that Mr. Hubbard lived there. It was all
22 centered around him.

23 Q Who told you that Mr. Hubbard feared that
24 Mrs. Hubbard would be tailed to La Quinta?

25 A Whoever said it at the time.

26 Q Tell me his name.

27 A The first time I believe I talked about this
28 thing, I believe it was Wayne Marple. That was some weeks

1 after my arrival there, and this was the "Why, you know, are
2 the guards being doubled?"

3 "Because, you know, the Boss figures she may be
4 tailed."

5 Q So, now you are saying that Wayne Marple told
6 you that?

7 A I'm saying that we doubled the guards; okay?
8 The reason that was given for the doubling of the guards was of
9 the fear that she may be tailed. Now, I didn't have that fear.
10 Who had it? Mr. Hubbard had the fear. It was for his
11 security, not for us. We're all out there in the open.

12 Q In your affidavit, you are quick to give his
13 thought processes and his fears, and I'm trying to learn the
14 source of your stating he feared that she might be tailed. You
15 told me now that he did not tell you that. I'll ask you who
16 did.

17 A I was informed the order came from him.

18 Q But there was no written order?

19 A No written order.

20 Q And what you are telling me is that Wayne Marple
21 told you that?

22 A Yeah.

23 Q Now, initially I asked you what Wayne Marple
24 told you. You did not mention that part of it. Why are you
25 now telling me that Wayne Marple told you that?

26 A What Wayne Marple told me -- I asked him why are
27 we doubling the guards. To me it didn't make sense. All of a
28 sudden, we got two guards. We hadn't had guards on before.

1 "Well, it's because the Lady's on the property,
2 and the order came from the Boss."

3 I mean, it's as simple as that.

4 Q So you concluded the remainder of your statement
5 here? It's your conclusion based upon what you have told me
6 what Wayne Marple told you?

7 A Yes, it is.

8 Q Now, you say in the first two sentences of
9 Paragraph 8 that all of '78, Mr. Hubbard resided at the Rifle
10 property, "and I observed him almost daily."

11 Is it your testimony that during the entire year
12 of 1978 you saw Mr. Hubbard every day?

13 A I observed -- how shall I put this? I observed
14 him on an almost daily basis through September.

15 Q Of 1978?

16 A Of 1978. And in September -- must be more than
17 that because --

18 Q In August of 1978, you entered the RPF?

19 A And still.

20 Q Did you not work in the date fields?

21 A Yeah.

22 Q Did you not testify at any other hearing that
23 you worked in the date fields?

24 A Yeah.

25 Q Well, then, when you work in the date fields, you
26 are not seeing Mr. Hubbard on a daily basis, are you?

27 A Well, the date field work had to do with
28 irrigating the property, and I did that a number of -- a number

1 of times, and it was a nighttime process; it went all the way
2 through the night. However, the RPF on a general basis worked
3 at the La Quinta property, and I saw Mr. Hubbard throughout
4 that period.

5 Now, there was a period of time when I was
6 working when -- this was in December -- when I did not see him
7 because he left the property and took a motel room while his
8 place in La Quinta was being renovated. But that's the longest
9 period. During most of that time, I was on guard duty or
10 doing some sort of work over at his place, or I saw him when
11 he would go on his walks.

12 Q During the time you were in the RPF, did you
13 serve on guard duty?

14 A Yep.

15 Q That's the function of people assigned to RPF?

16 A Yes. We all had guards.

17 Q And you had guard duty at Mr. Hubbard's
18 residence?

19 A No.

20 Q Where was your guard duty?

21 A Monroe.

22 Q Well, you said that Mr. Hubbard was at Rifle.

23 A Yes. We went to the La Quinta property on
24 practically a daily basis, and on practically a daily basis
25 I would see Mr. Hubbard.

26 Q Would you have occasion to talk to him and
27 converse with him?

28 A Other than maybe opening his gate, not during

1 that period.

2 Q So during all of 1978, other than to say hello
3 when you opened the gate for him on one or two occasions, you
4 did not talk to him?

5 A No. I did a lot of talking to him. We shot
6 movies on a daily basis for months.

7 Q During what period of time?

8 A 1978. Starting in March and probably finishing
9 when he threw me in the RPF in August or September.

10 Q What is the function of the RPF?

11 A The RPF is to break the will of anyone who
12 opposes -- opposes L. Ron Hubbard.

13 Q Opposes him?

14 A (Witness nods head.)

15 Q What do the letters "RPF" stand for?

16 A Rehabilitation Project Force.

17 Q And you used the term earlier about being locked
18 up in the RPF. Is that the term you used?

19 A It was two occasions I was locked up in the
20 Manor.

21 Q Were those on the orders of Mr. Hubbard?

22 A Yeah.

23 Q Did you say "Yes"?

24 A Yes.

25 Q Did you resent that?

26 A I think so.

27 Q How many times did Mr. Hubbard have you locked
28 up?

1 A. He had me locked up once and twice assigned to
2 the RPF.

3 (Brief recess.)

4 (The record was read by the reporter.)

5 BY MR. JOHNSON:

6 Q Turning to Paragraph 9, Mr. Armstrong, your last
7 sentence where it discusses the getaway car, would you tell me
8 about that.

9 A That was a getaway car which was kept by
10 Mr. Hubbard's residence, and it was designated the "getaway
11 car," and it was not used for any other purpose.

12 Q Who designated it as such?

13 A All the guards were briefed that that was it.
14 It was known by me at least. I was briefed on it when I first
15 came on the property, and I continued to see it around
16 throughout that period.

17 Q Describe the car.

18 A It was a -- oh, a Dodge. I think it was a brown
19 Dodge Dart or Plymouth Valiant. It was that kind of car, and
20 I was told that it had a hot engine in it, that it was a fast
21 car.

22 Q Who told you that this was known as the getaway
23 car?

24 A Oh, let me think. Don Bateman.

25 Q Who is he?

26 A He is a person out at the property. Messengers
27 mentioned it.

28 Q What messengers?

1 A Dede.

2 Q Her last name?

3 A Voegeding.

4 Q Who else?

5 A I don't know. It was just common -- it was like
6 common knowledge.

7 Q Well, you see, what I'm trying to find out is
8 what you know of your own personal knowledge and what you may
9 have heard someone else say.

10 Did Mr. Hubbard ever tell you that this was his
11 getaway car?

12 A No.

13 Q Did Mrs. Hubbard ever tell you it was her getaway
14 car?

15 A No.

16 Q Where were the keys to the car kept?

17 A I was told that it was kept with the messengers.

18 Q Who told you that?

19 A When we were -- when I was originally taking
20 over the guard duties.

21 Q Were there more than one set of keys for the car?

22 A I don't know.

23 Q What messenger had the keys?

24 A I don't know. My understanding was that they
25 were kept in a particular location in the messengers' office.

26 Q Do you know where that was?

27 A No.

28 Q Now, you say "stationed beside the Rifle

1 residence." You have been to the Rifle residence many, many
2 times, have you not?

3 A. Yes.

4 Q. You have a mental image of what the Rifle
5 residence looks like, don't you?

6 A. Yes.

7 Q. Tell me how you can station a car beside the
8 Rifle residence.

9 A. There's a -- I saw it in two locations there.
10 One was a road which runs along back behind the property, and
11 the other location was over by the studio, an old -- it was
12 called a date packing plant.

13 Q. So when you say "beside the Rifle residence,"
14 that's not accurate, is it? There's not room to put a car
15 beside the Rifle residence, is there?

16 A. Well, you could, but it was like at the corner
17 off to one side.

18 Q. Well, is it or is it not true that this is
19 inaccurate to say that the car was stationed beside the Rifle
20 residence?

21 A. It may be more accurate to say that the getaway
22 car was stationed to the rear and to the side of the Rifle
23 residence during part of that period, and when it was not
24 there, it was kept about a hundred yards away to one side at
25 the date packing plant.

26 Q. As a matter of fact, all the cars there close to
27 the Rifle residence were parked in front of the Rifle residence,
28 weren't they? You are familiar with the area in front of the

1 residence?

2 A Yes.

3 Q Isn't it true that all the cars were always
4 parked in front of the Rifle residence?

5 A All except the getaway car.

6 Q Did you ever see anyone drive the getaway car?

7 A Yeah.

8 Q Who did you see drive the getaway car?

9 A Don Bateman.

10 Q And what was the occasion when you saw him drive
11 it?

12 A I don't know.

13 Q Did Don Bateman ever tell you that the so-called
14 getaway car was never used for any purpose but for getaway?

15 A Well, that it was never to be used. It may have
16 been used, but that was its designation. It was never used by
17 anyone else on the property for any reason. It sat there
18 tuned and ready to go.

19 Q As a matter of fact, isn't it true that you saw
20 that car in several locations during the period of time that
21 you visited the Rifle location?

22 A I saw it in those two locations.

23 Q And you saw it away from its location when you
24 saw it driven by Don Bateman, is it not --

25 A I saw it at that time being driven from the
26 mechanic's area, which was maybe another hundred, 200 feet
27 away.

28 Q What was Don Bateman's connection with the

1 Messengers Organization?

2 A Don Bateman was -- held various posts at various
3 times, but he was in the Transport Unit during at least part
4 of this period.

5 Q And what did the Transport Unit do?

6 A They maintained vehicles or drove them.

7 I should add that Richard Allcock I also saw
8 driving that vehicle, also on the property; for what purpose,
9 I don't know, but I did see him in the vehicle.

10 Q So it's not accurate when you say in that last
11 sentence of Paragraph 9 that the car was never used for any
12 other purpose?

13 A No, that's not -- it is accurate.

14 Q Did you ever see any order from Mr. Hubbard
15 which designated this Dodge Dart or Plymouth Valiant you have
16 described as the getaway car as being the getaway car?

17 A No.

18 Q You say it was designated as a getaway car never
19 to be used for any other purpose. What do you mean by
20 "getaway"?

21 A In the event of a raid or in the event of
22 process servers arriving on the property, that car was to be
23 kept available for Mr. Hubbard's getaway.

24 Q Well, how many exits were there from the
25 property?

26 A Three -- four, maybe five.

27 Q And what roads, would you please describe for
28 the record, lead to the Rifle property?

1 A. I believe one of them is called Obregon and
2 Washington. I think it sat on the corner between Obregon and
3 Washington, and the one at the other end, I don't know what the
4 names of these things were.

5 Q. You said earlier that Mr. Hubbard went to Sparks,
6 Nevada. Did he flee in the getaway car?

7 A. I don't know.

8 Q. Did you inquire or did you read any writings or
9 letters or communications which would tell you whether he fled
10 in the getaway car?

11 A. I was told by Dede, Diana Voegeding, that he went
12 in a car which was a Buick station wagon designated -- given
13 the name "Beauty."

14 Q. Was this so-called getaway car a two-door or
15 four-door car?

16 A. To my recollection, it was a two-door, but I'm
17 not sure. It was brown.

18 Q. You are sure it was not a van?

19 A. Nope.

20 Q. It would be pretty difficult to conceal a person
21 in a Dodge Dart car or Plymouth Valiant, would it not?

22 A. I don't know what the rationale was behind it.

23 Q. If you intended to conceal a person, wouldn't
24 it be more logical to have a van to conceal that person?

25 MR. LOGAN: Objection. Argumentative.

26 BY MR. JOHNSON:

27 Q. Sir?

28 A. If you intended to conceal?

1 Q Yes.

2 A Sure. I mean, Mr. Hubbard has used vans for
3 that sort of activity. Why he didn't on that particular
4 occasion -- maybe he hadn't tumbled to the idea yet. Within
5 a year he had a van which he used to arrive on the Gilman Hot
6 Springs property without being seen and -- but on that
7 particular time, there was a -- this Chrysler product which was
8 designated the getaway car.

9 Q For how long a period of time was this so-called
10 getaway car parked at these various locations near the Rifle
11 property or near the date packing house?

12 A I observed it there in either of the two
13 locations throughout most of 1978 up to perhaps August or
14 September.

15 Q And that's when you were placed in the RPF?

16 A Yeah.

17 Q After you were put in the RPF, did you ever
18 observe it again?

19 A I don't recall. I don't recall.

20 Q Let's turn to Paragraph 11. You speak of
21 renovations at Rifle in La Quinta in the fall of 1978.

22 Let me ask you: from August of 1978 until what
23 date were you in the RPF?

24 A I guess until April.

25 Can I ask you a question for my own edification?

26 Q Surely.

27 A Do you represent Mr. Hubbard?

28 Q No, sir. I represent the Church of Scientology.

1 A Yeah.

2 Q So during this period of time -- you are talking
3 about the fall of '78 when the renovations were ordered -- you
4 were assigned to the RPF from August of '78 to April of 1979;
5 is that correct?

6 A Yes.

7 Q Is it your testimony that while you were in the
8 RPF that you did these renovations that are described here?

9 A Yeah.

10 Q What was your designation or your hat or whatever
11 you call it?

12 A During the period of time in which I participated
13 in this?

14 Q Yes, sir.

15 A I had a number of them. I was the RPF MAA.

16 Q Is that the Master at Arms?

17 A Yes.

18 Q Could we stop at each one. And what was your
19 function as the Master at Arms?

20 A The function of the Master at Arms was to insure
21 that L. Ron Hubbard's rules for the RPF were adhered to and
22 that a person's will was broken in due course.

23 Q Did you succeed in breaking the wills of those
24 who were assigned to the RPF with you?

25 A To my regret, I think I did.

26 Q Do you consider that your will was broken?

27 A Yep.

28 Q Then what was your other post or hat during this

1 period of time?

2 A I was designated Suppressive Person.

3 Q And when was that?

4 A That was when I was first assigned to the RPF.

5 Q And who so designated you?

6 A Mr. Hubbard.

7 Q Why did he so designate you?

8 A Because he thought I was joking about his film-
9 making activities.

10 Q What other designations did you carry?

11 A Those are the main two.

12 Q Well, was anyone designated as being in charge
13 of renovations in La Quinta?

14 A Bill Lazaroni.

15 Q What was his title?

16 A He was the RPF Bosun.

17 Q And what were the functions of an RPF Bosun?

18 A He was the overall in-charge of the RPF.

19 Q Overall in-charge. Was he actually assigned to
20 the RPF or supervising those assigned to the RPF?

21 A No. He was assigned. Now, again, if you
22 follow this logic far enough, you arrive only at L. Ron Hubbard.
23 So L. Ron Hubbard was in charge of the RPF. So L. Ron Hubbard
24 supervised the renovations of his own home, using the RPF.
25 Okay? So ...

26 Q Was there a designation of someone to be in
27 charge of renovations? Is there such a designation?

28 A There may have been.

1 Q Were you ever so designated?

2 A Yes.

3 Q What was that designation?

4 A LRH Renovations In-Charge.

5 Q And when were you so designated?

6 A In 1979.

7 Q After you had served your time in the RPF?

8 A Yes.

9 Q Who was designated LRH Renovations In-Charge
10 while you were in the RPF?

11 A There wasn't one.

12 Q Well, when you were released from the RPF in
13 April of 1979, is it your testimony that L. Ron Hubbard was
14 at the Rifle facility at La Quinta?

15 A No.

16 Q Well, where was he, if you know?

17 A At what time in 1979?

18 Q When you were discharged from the RPF in April
19 1979, where was L. Ron Hubbard?

20 A Around that period, he moved.

21 Q To where?

22 A Hemet.

23 Q When did he move to Hemet?

24 A Sometime in early 1979.

25 Q How do you know that?

26 A I was told that.

27 Q By whom?

28 A By Warwick Allcock, by Mike Douglas, by Kima

1 Douglas, Lola Roussouw.

2 Q Did you ever talk to Mr. Hubbard about his move?

3 A No.

4 Q In the fall of 1978, you did a number of
5 renovations at La Quinta, and you described them in your
6 affidavit. Were all of these renovations done to the house
7 at Rifle?

8 A Yes.

9 Q Did they have anything to do with the offices
10 or office complex there at Rifle? You described earlier there
11 were offices at Rifle.

12 A Yeah. Mr. Hubbard had an office there.

13 Q Did you make any renovations to the office?

14 A Yeah.

15 Q What renovations did you make to the office?

16 A We tiled the floor; we painted the walls; we
17 cleaned; we took books out and put back books; and that sort
18 of thing.

19 Q Is it your testimony, or is it the thrust of
20 your affidavit, that because of these renovations to the
21 house at Rifle, that L. Ron Hubbard planned to have that as
22 his permanent residence?

23 A I think that it certainly would contribute to
24 the proof that he did intend to reside there permanently.

25 Q Is that what you contend in your affidavit --
26 that that was his permanent residence?

27 A He intended it as such.

28 Q Well, did he make it his permanent residence?

1 A He never made anywhere his permanent residence,
2 has he?

3 Q I'm not aware of any. That's why I'm asking you.

4 A He intended to live there and at Gilman Hot
5 Springs.

6 Q He never lived at Gilman Hot Springs, did he?

7 A No. But he intended to. He certainly had me
8 carry out a lot of renovations there in his name and at his
9 order.

10 Q And isn't it true --

11 A Either that, or it was a very elaborate ruse he
12 was running on me.

13 Q And isn't it true that after you had done all
14 the renovations in the house at Rifle that Mr. Hubbard did not
15 remain there at the house in Rifle?

16 A No, that's not true.

17 Q Well, how long did he remain in the house at
18 Rifle after you completed your renovations?

19 A Four months, something like that.

20 Q Then when did he leave the house at Rifle?

21 A I think it was around April.

22 Q That's what you were told, but you don't have
23 any personal knowledge?

24 A No.

25 Q Now, you say in your Paragraph 11 that you set
26 up Mr. Hubbard's library. Is that an accurate statement?

27 A I said ordered by Mr. Hubbard and carried out by
28 me or personnel in my charge were; I list down a number of

1 things, and then one of them is setting up his library.

2 Yes, that's a very accurate statement.

3 Q Let's discuss that. Tell me what you set up
4 there in the house at Rifle. Describe what you did to set up
5 his library, as you have stated here.

6 A When we began the renovations at Rifle, all of
7 his books, which were in the Rifle house at that time, were
8 taken out. They were put in boxes, and upon completion of the
9 painting, tiling, cleaning, the bookshelves were brought back
10 into his office and bookshelves were brought into his bedroom,
11 and the RPF then wiped every page of every book for dust, and
12 we set up all his books again. We set up his library.

13 Q Did you designate a particular room as a library
14 room?

15 A There were bookshelves which covered a great
16 piece of the office, and that was designated as the library.

17 Q How large was the office?

18 A I don't -- 20 by -- 20-by-20.

19 Q You talked about personal belongings being
20 stored at Rifle. As a matter of fact, his personal belongings
21 were stored at Olive, were they not?

22 A I do not believe so.

23 Q Was there a warehouse that was not either on
24 the Rifle or the Olive properties in the La Quinta area that
25 was used? Do you recall a warehouse there?

26 A Was your statement was there a warehouse that
27 was not on either?

28 Q Which was not on the Rifle or the Olive property.

1 A small warehouse.

2 A Yes.

3 Q Was this not the location of the storage of most
4 of his personal belongings?

5 A I would say three quarters of them.

6 Q When he left La Quinta, were his personal
7 belongings still stored in that warehouse?

8 A I don't know.

9 Q Do you recall the stables out in front --

10 A Yes.

11 Q -- of the Rifle --

12 Did he have gear stored in the stables?

13 A Yes.

14 Q When he left La Quinta, did his gear remain in
15 the stables?

16 A I did not go with him from La Quinta.

17 Q Did you ever have occasion to look at the gear
18 in the stables after he left?

19 A Yes.

20 Q Were they still there after he left?

21 A I never went back to the stables after he left.

22 Q Did you say that you personally inventoried his
23 personal belongings that were stored in the warehouse and in
24 the stables?

25 A No.

26 Q Who did the inventorying?

27 A I never said anyone inventoried the personal
28 material that was in the warehouse and in the stables.

1 Q What personal belongings were inventoried?

2 A The personal belongings that were in the stables.

3 Q But three quarters of his personal belongings
4 were in the warehouse; is that not correct?

5 A That's right.

6 Q So is it your testimony that you inventoried
7 approximately a quarter of his personal belongings there?

8 A I set up an inventory of his personal belongings
9 stored on the Rifle and Olives property which consisted of
10 about a thousand boxes or equivalent large items such as
11 furniture.

12 Q I guess the question that I'm trying to ask is:
13 you have such detail in your Paragraph 11 and your testimony
14 is based on your recollection of what occurred back in 1978
15 and not based upon anything else?

16 A Right.

17 Q It's not based upon review of any documents or
18 not based on any conversations with Kima Douglas or Michael
19 Douglas?

20 A No.

21 Q And since you have written this affidavit, have
22 you given more thought to Paragraph 11 as to the accuracy of it?

23 Have you had occasion to review your allegations
24 here about tiling the office spaces -- as to whether that was
25 accurate?

26 A Yes, it's accurate.

27 Q And in retrospect, was there any other work
28 you did at Rifle other than what you have listed here in

1 Paragraph 11?

2 A Oh, undoubtedly. This is -- this is what came
3 to mind or I recalled, but undoubtedly was -- I mean we picked
4 apart tiny little specs of fiberglass out of ducts, and we
5 took apart air-handler units, and we swept the grounds, and
6 we, you know, cleaned windows. So there's -- there's umpteen
7 dozen things that were done.

8 Q That is what you and others in the RPF were
9 working on on this project?

10 A Yeah.

11 Q Tell me about the conversations you had with
12 Mr. Hubbard concerning the renovations you described in
13 Paragraph 11.

14 A I didn't have any with him.

15 Q Were there any written orders that you received
16 that purported to originate from Mr. Hubbard concerning the
17 renovations of the house at Rifle?

18 A All orders from Messengers.

19 Q Any written orders?

20 A Not that I recall.

21 Q What Messengers gave you orders concerning the
22 renovations that you have described in Paragraph 11?

23 A Oh, boy. Let me think. Pat Broeker.

24 Q Who else?

25 A Doreen Gillham.

26 Q Doreen?

27 A Gillham. G-i-l-l-h-a-m.

28 Q Anyone else?

1 A That's all I recall. We were briefed on what
2 he wants, and his Household Unit people were there. Kima
3 Douglas.

4 Q Mike Douglas?

5 A (No response.)

6 Q Turning to Paragraph 12, if you please, here
7 again you use the word: "It was considered that the cover at
8 La Quinta was 'blown.'"

9 A Again, this is what I was told by --

10 Q By whom?

11 A By -- by Kima, by Diana Voegeding, by Laurel
12 Sullivan, and --

13 Q You were told by them at that time?

14 A Around --

15 Q The reason I ask that is because you previously
16 testified you were in the RPF and you were on communication
17 lines with all these people when you were in the RPF?

18 A I was on communication lines with Kima Douglas
19 because she was one of the few people who would speak to RPF
20 members, but all of us were briefed. We were briefed before
21 we went to the Gilman Hot Springs property. There was a
22 briefing of all staff at La Quinta at which even RPF members
23 were allowed to attend. And at that point, it was laid out
24 to us that LRH viewed the property as blown, and he has
25 ordered that this other property be found. And that was the
26 first time when we were told -- this was probably early
27 December 1978 -- where the property was, and shortly after
28 that the RPF was sent to the property to begin readying a

1 residence for Mr. Hubbard, and we were all briefed to that
2 effect. We were briefed that this is his decision and got
3 to get on with it.

4 Q Was Mr. Hubbard present at this briefing you
5 described?

6 A No.

7 Q Who conducted the briefing you described?

8 A I think it was Bill Robertson.

9 Q What was his position?

10 A Oh, he was like a -- he was an executive of
11 some sort up there.

12 Q Have you ever seen any document in which
13 Mr. Hubbard states that that was the reason for leaving
14 La Quinta?

15 A I don't believe so.

16 Q All right. You were aware of the space
17 limitations at La Quinta to conduct filming operations, were
18 you not? You said you were placed in the RPF because of your
19 criticisms of the filming operations; is that also correct?

20 A Not because of my criticism, but because he said
21 I had joked about it.

22 ~~Q Well, what facilities were available at~~
23 La Quinta for filming?

24 A Well, there was a studio. There were two
25 studios.

26 Q What was the size of the studios at La Quinta?

27 A I guess it was a -- I don't know -- a couple
28 hundred feet long, a hundred feet wide, fifty feet high. I

1 don't know. Pretty big.

2 Q Were you aware of what facilities were available
3 at Gilman Hot Springs for film production and expansion?

4 A Yes.

5 Q What facilities were available there?

6 A None.

7 Q What facilities were constructed there?

8 A A studio about the size of the one at La Quinta.

9 Q Is it your testimony that the accommodations
10 for filming were no better at Gilman than they were at
11 La Quinta?

12 A Maybe minimally. I mean, they spent at La Quinta--
13 they spent an uncommon amount of money and built a major studio,
14 and then within a few months of doing that, because it was
15 viewed as blown, they up and went. Now, the fact was there
16 was a big studio at La Quinta.

17 Q When you say "viewed as blown," here again, you
18 are talking about that statement to you by Robertson?

19 A What?

20 Q When you use the words "it was viewed as blown,"
21 here again you are referring to what Bill Robertson stated to
22 you?

23 A Bill Robertson briefed the staff. Various
24 people briefed the staff. But word was out that the Hartwells
25 had returned to the property, that the Hartwells were going
26 to the press, or that they had contacted the police, and that
27 for that reason we had to move awfully quick and get out of
28 there.

1 Q Was anything being done against the law at the
2 La Quinta property?

3 A That's an interesting question. I think that --
4 let's put it this way: I don't know of any crimes.

5 Q And you never discussed the move with Mr. Hubbard,
6 as you have already stated?

7 A No.

8 Q Who purchased the property at Gilman Hot Springs?
9 Do you know of your own personal knowledge?

10 A I understand Kima Douglas, but I don't know of
11 my own personal knowledge.

12 Q You describe in Paragraph 12: "Because he felt
13 in danger of being served with process, Mr. Hubbard decided to
14 acquire the property."

15 What is the source of that statement?

16 A Briefings to us at La Quinta.

17 Q By whom?

18 A By Mr. Robertson.

19 Q But I understood you to say that the briefing
20 with Mr. Robertson -- he described that the cover of La Quinta
21 was blown and the Hartwells had returned to the property, and
22 that was the reason for the move and --

23 A And what was going to come out of that was
24 someone was going to try to serve Mr. Hubbard, or the Feds
25 were going to come down. There was some danger, in their
26 opinion, to Mr. Hubbard's security. Mr. Hubbard was concerned
27 about it. "We got to go."

28 Q And that statement and your Paragraph 12 of your

1 affidavit are based upon what Bill Robertson told you and not
2 based on anything else?

3 A. It's based upon a number of things. I was there
4 on the property at the time. I was in --

5 Q. You were in the RPF at the time, were you not?

6 A. I was in the RPF.

7 Q. You were stationed on Monroe?

8 A. I was stationed at Monroe, and I slept on Monroe,
9 but we came on a daily basis by bus to the La Quinta property.
10 There is no way that I could be on the property and not have
11 a lot of perception of what was going on. Additionally, I
12 was working on the studio at that time, and I therefore was
13 in communication with some of the people that I had to work
14 with in working in the studio.

15 Additionally, I heard interviews of Gale Irwin
16 and Diana Voegeding, both of whom explained this whole thing
17 and how --

18 Q. When were those interviews taking place?

19 A. 1980.

20 Q. Long after. I'm trying to find out what you
21 knew in 1978 of your own personal knowledge, Mr. Armstrong,
22 because it appears to me that you are summarizing what you have
23 read or heard in the last year or so, and I'm trying to see
24 what you knew at that time.

25 A. I knew at that time that the cover had been
26 blown; that the Hartwells were threatening to bring the police
27 in on the picture; that Mr. Hubbard had ordered another
28 property to be found; and that it was found, it was purchased,

1 and we were all to move; and that I was sent ahead with the
2 rest of the RPF to ready Mr. Hubbard's residence at the
3 La Quinta property.

4 Q So you put in information such as "He approved
5 the purchase of a 500-acre golf course." Did you get that
6 from Bill and Kima Douglas? Is that the source of this
7 statement that you have in Paragraph 12?

8 A At this briefing, that's what was told.

9 Q So what you are telling --

10 A The fact was -- the -- really, the fact was
11 nothing of that magnitude was done without L. Ron Hubbard's
12 either order or approval. I mean, virtually nothing. The man
13 controlled every facet of Scientology down to what pen one
14 could use.

15 Q That's your conclusion, isn't it?

16 A I observed it.

17 Q You are also quite resentful of him having put
18 you in the RPF, were you not?

19 A I am trying to be truthful of what the situation
20 really was, and others are trying to cover up the truth of
21 what really occurred. That's the simplicity of it.

22 Q Let me ask you candidly: Isn't your resentment
23 toward LRH coloring your view of these matters here?

24 A I think that you gather that I'm resentful.

25 Q Because you told me you were.

26 A I told you I was. Does that mean I am now?

27 Q Well, I notice that you have in your affidavit
28 things that you have no personal knowledge of, and until I

1 inquire of you, it would appear that you had personal knowledge,
2 and upon inquiry it seems that you have learned this all from
3 someone else. So, yes, I guess that I think that your
4 resentment has colored your affidavit.

5 Yes, in answer to your question. That's the
6 reason I'm trying to ask you these questions.

7 I want to know what you know of your own
8 personal knowledge and knew at that time and what someone else
9 told you.

10 A I know that the real substance of what I've
11 written here is the truth, and I know that the organization
12 is trying to, for some reason, cloud this fact and is nit-
13 picking to cover up the truth.

14 Q All right. In Paragraph 12, then, other than the
15 fact that you and 20 other personnel went to Gilman Hot
16 Springs, everything else in Paragraph 12 is what someone else
17 has told you; is that correct?

18 A I don't think so.

19 Q Well, what in here do you know of your own
20 personal knowledge that you did not learn from hearsay other
21 than the fact that you in December went to La Quinta with 20
22 other people? Look at Paragraph 12 and tell me what else you
23 know of your own personal knowledge.

24 A Now, all the people there from December within
25 probably two or three months vacated several million dollars'
26 worth of property; they vacated a studio which had been
27 constructed for the purpose of making Scientology films; they
28 vacated tremendous facilities which had been established by

1 that; they vacated without a sale in advance, and they held on
2 to those properties, and they moved en masse to another
3 property.

4 Now, they did not do that because suddenly they
5 needed more space or they needed a bigger studio. The fact
6 was they moved to a place where there was no studio, none
7 whatsoever, and it was not for quite -- another year until a
8 studio was built. The fact was that I was briefed on the fact
9 that the cover for the property had been blown, and there was
10 a possibility that people would try and serve L. Ron Hubbard
11 or that the police or other authorities would be descending
12 on the property, something like that. We had to leave, and I
13 was part of the spearhead to set this place up as rapidly as
14 possible so that L. Ron Hubbard would again have a home.

15 Q When you said you were briefed, are you talking
16 about what Bill Robertson said to you?

17 A Yes. I mean the whole place was briefed.

18 Q In your subsequent discussions with people like
19 Kima Douglas and Mike Douglas and others, had you heard that
20 the property at La Quinta had been sold?

21 A I believe it has.

22 Q Did you learn it was sold for profit?

23 A Probably was.

24 Q Kima and Bill Douglas told you that?

25 A You mean Kima?

26 Q Kima Douglas told you this, didn't she?

27 A I think so. That has nothing to do with the
28 fact that they left just suddenly from five or -- at least five

1 properties.

2 (Off-the-record discussion.)

3 MR. JOHNSON: It is agreed with all present here that
4 Mr. Armstrong will return at 9:00 o'clock tomorrow morning.

5 MR. LOGAN: I'm agreeing that I will be here.

6 MR. JOHNSON: And Mr. Armstrong, you are agreeing that
7 you will be here?

8 THE WITNESS: Yes, I will be here.

9 (Whereupon, the deposition was

10 continued to 9:00 A.M., Wednesday,

11 February 9, 1983.)

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IN WITNESS WHEREOF, I have hereunto subscribed my name
this day of 1983.

GERALD ARMSTRONG

1 STATE OF CALIFORNIA)
2) ss.
3 COUNTY OF LOS ANGELES)

4 I, RUTH PERSKY, CSR #5673,
5 a Notary Public in and for the County of Los Angeles, State
6 of California, do hereby certify:

7 That prior to being examined, the witness named in the
8 foregoing deposition, GERALD ARMSTRONG, (VOLUME I),
9 was by me duly sworn to testify the truth, the whole truth
10 and nothing but the truth.

11 That said deposition was taken before me at the time
12 and place therein set forth and was taken down by me in
13 shorthand and thereafter transcribed into typewriting under
14 my direction and supervision, and I hereby certify the
15 foregoing deposition is a full, true and correct transcript
16 of my shorthand notes so taken.

17 I further certify that I am neither counsel for nor
18 related to any party to said action nor in anywise interested
19 in the outcome thereof.

20 IN WITNESS WHEREOF, I have hereunto subscribed my
21 name and affixed my official seal this 19th day of
22 February, 1983.

23
24 *Ruth Persky*
25 Notary Public in and for the County
26 of Los Angeles, State of California

